



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan

June 30, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027 Commissioner
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: DaimlerChrysler Corporation 067-5246-00065

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

FNTVOP.wpd 8/21/02

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVOP.wpd 8/21/02

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**DaimlerChrysler Corporation
Kokomo Casting Plant
1001 E. Boulevard
Kokomo, Indiana 46904**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T067-5246-00065	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 30, 2003 Expiration Date: June 30, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates an aluminum die cast facility, including melt furnaces, machinery, cleaning and heat treating equipment to produce transmissions for use in automobiles and light-duty trucks.

Responsible Official:	Plant Manager
Source Address:	DaimlerChrysler Kokomo Casting Plant 1001 East Boulevard, Kokomo, Indiana 46904
Source Address:	Chrysler Kokomo Transmission Plant 2401 S. Reed Road, Kokomo, Indiana 46904
Mailing Address:	1001 East Boulevard, Kokomo, Indiana 46904
General Source Phone Number:	(765) 454-1526
SIC Code:	3363
County Location:	Howard
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This source consists of two (2) plants:

- (a) The Kokomo Transmission Plant (KTP) is located at 2401 S. Reed Road, Kokomo, IN 46904; and
- (b) The Kokomo Casting Plant (KCP) is located at 1001 East Boulevard, Kokomo, IN 46904

Both plants have the same source identification number, which is 067-00065.

Since the two (2) plants are located on contiguous properties, KCP is acting as a support facility for KTP, and the two plants are under common control of the same entity, they will be considered one (1) source. The two plants have also been considered as one single major source in previous permit approvals.

Separate Part 70 permits are being issued to Chrysler Corporation, Kokomo Transmission Plant and Chrysler Corporation, Kokomo Casting Plant solely for administrative purposes. The Part 70 Permit No.: T067-6504-00065 for Chrysler Corporation, Kokomo Transmission Plant was issued on September 1, 1999.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1ARF with a maximum remelt capacity of one (1) ton per hour, constructed in 1988, with a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;

- (b) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1BRF with a maximum remelt capacity of one (1) ton per hour, constructed in 1988, with a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (c) one (1) natural gas-fired aluminum reverberatory furnace, identified as 2RF with a maximum remelt capacity of thirty (30) tons per hour, constructed in 1984, with a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 2RF and 2RCW;
- (d) one (1) natural gas-fired aluminum reverberatory furnace, identified as 4RF, constructed in 1998, with a maximum remelt capacity of 6.5 tons of scrap metal per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 4RF and 4RCW;
- (e) one (1) natural gas-fired aluminum reverberatory furnace, identified as 5RF with a maximum remelt capacity of thirty (30) tons per hour, constructed in 1978, with a maximum heat input capacity of 18 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 5RF and 5RCW;
- (f) one (1) natural gas-fired aluminum reverberatory furnace, identified as 6RF with a maximum remelt capability, constructed in 1983, with a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 6RF and 5RCW;
- (g) one (1) natural gas-fired aluminum reverberatory furnace, identified as 7RF with no remelt capability, constructed in 1995, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 7RF;
- (h) one (1) natural gas-fired aluminum reverberatory furnace, identified as 8RF with no remelt capability, constructed in 1995, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 8RF;
- (i) one (1) natural gas-fired aluminum reverberatory furnace, identified as 9RF with no remelt capability, constructed in 1998, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 9RF;
- (j) one (1) natural gas-fired aluminum reverberatory furnace with no remelt capability, identified as 10RF, constructed in 1998, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (k) one (1) natural gas-fired boiler, identified as 1BLR, constructed in 1964, with a maximum heat input capacity of 95 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1SB;
- (l) one (1) natural gas-fired boiler, identified as 2BLR, constructed in 1964, with a maximum heat input capacity of 81.26 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 2SB;
- (m) one (1) natural gas-fired boiler, identified as 3BLR, constructed in 2000, with a maximum heat input capacity of 77.9 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 3SB;
- (n) one (1) Pangborn shotblast machine, identified as DC1, constructed in 1968, with a maximum shotblast rate of 72 tons per hour, with emissions controlled by a scrubber;

- (o) one (1) Mesh Belt shotblast machine, identified as DC2, constructed in 1997, with a maximum shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter;
- (p) one (1) Mesh Belt shotblast machine, identified as DC6, constructed in 1997, with a maximum shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter;
- (q) one (1) Rotoblast shotblast machine, identified as DC3, constructed in 1994, with a maximum shotblast rate of 88,350 pounds per hour, with emissions controlled by cartridge filter;
- (r) one (1) Tumbleblast shotblast machine, identified as DC5, constructed in 2000, with a maximum shotblast rate of 40,000 pounds per hour, with emissions controlled by cartridge filter;
- (s) one Wire Mesh machine used for deburring of parts, identified as DC4, constructed in 1999, with a maximum shotblast rate of 174,760 pounds per hour, with emissions controlled by a cartridge filter;

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 3RF, with a maximum remelt capacity of 1.5 tons per hour, constructed in 1997, with a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 3RF;
- (b) die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, 1998 and 2001, with emissions uncontrolled and exhausting internally;
- (c) trim machines, with emissions uncontrolled and exhausting internally;
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (f) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal; and
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; woodworking operations, tooling operations including dry grinding/sanding/cutting stations wet grinding stations using a maximum of 0.09 gallons of cutting oil per hour, with emissions controlled by a baghouse and exhausting internally.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability) because the facility is a major Title V source.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of

confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated

after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ, has made the following determinations regarding this source:
 - (a) 326 IAC 6-2 (Emission Limitations for Sources of Indirect Heating) is not applicable to any boiler at this source. Instead, 326 IAC 6-1-2 is applicable to the boilers.
 - (b) 326 IAC 6-3-2 (Process Operations) is not applicable to any emission unit at this source. Instead, 326 IAC 6-1-2 or 326 IAC 6-1-15 is applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as

expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 19, 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports

[326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal"

parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period

starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports

do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1ARF with a maximum remelt capacity of one (1) ton per hour, constructed in 1988, with a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (b) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1BRF with a maximum remelt capacity of one (1) ton per hour, constructed in 1988, with a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (c) one (1) natural gas-fired aluminum reverberatory furnace, identified as 2RF with a maximum remelt capacity of thirty (30) tons per hour, constructed in 1984, with a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 2RF and 2RCW;
- (d) one (1) natural gas-fired aluminum reverberatory furnace, identified as 4RF, constructed in 1998, with a maximum remelt capacity of 6.5 tons of scrap metal per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 4RF and 4RCW;
- (e) one (1) natural gas-fired aluminum reverberatory furnace, identified as 5RF with a maximum remelt capacity of thirty (30) tons per hour, constructed in 1978, with a maximum heat input capacity of 18 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 5RF and 5RCW;
- (f) one (1) natural gas-fired aluminum reverberatory furnace, identified as 6RF with no remelt capability, constructed in 1983, with a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 6RF/5RCW;
- (g) one (1) natural gas-fired aluminum reverberatory furnace, identified as 7RF with no remelt capability, constructed in 1995, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 7RF;
- (h) one (1) natural gas-fired aluminum reverberatory furnace, identified as 8RF with no remelt capability, constructed in 1995, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 8RF;
- (i) one (1) natural gas-fired aluminum reverberatory furnace, identified as 9RF with no remelt capability, constructed in 1998, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 9RF;
- (j) one (1) natural gas-fired aluminum reverberatory furnace, identified as 10RF with no remelt capability, constructed in 1998, with a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (k) one (1) natural gas-fired aluminum reverberatory furnace, identified as 3RF, constructed in 1997, with a maximum remelt capacity of 1.5 tons per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 3RF and 3RCW;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of PSD not applicable, the following conditions shall apply:

- (a) The furnaces shall comply with the PM, PM10, and production limits as shown in the table below.

Furnace Identification	PM limit (lbs/ton of metal)	PM10 limit (lbs/ton of metal)	Production limit (tons of metal per 12 consecutive month period)	Production Limit for First 12 months after issuance of this permit (tons of metal per month)
5RF	0.457	none	109,482	9,123.5
6RF	0.457	none	109,482	9,123.5
2RF	0.457	none	109,482	9,123.5
1ARF and 1BRF	2.35 (each)	none	68,046 (for both furnaces combined)	5,670.5 (for both furnaces combined)
4RF	0.875	0.527	not applicable	not applicable

(b) The furnaces shall comply with the PM and PM10 limits shown in the following table.

Furnace Identification	PM limit (lbs/hr)	PM10 limit (lbs/hr)
9RF and 10RF	2.15 (each)	1.02 (each)
7RF and 8RF	2.32 (each)	1.18 (each)
3RF	1.19	1.19

- (c) The PM limit for furnace 4RF shall supersede the requirements of Condition D.9.1(b)(1) of Construction Permit CP067-10006-00065 issued December 7, 1998.
- (d) The PM10 limit for furnace 4RF shall supersede the requirements of Condition D.9.1(b)(2) of Construction Permit CP067-10006-00065 issued December 7, 1998.
- (e) The scrap metal rate of furnace 4RF shall not exceed 6.5 tons per hour.
- (f) Furnace 4RF shall melt only clean scrap generated on-site.
- (g) Upon construction and operation of the proposed furnace No. 4, Furnace D shall be permanently taken out of service.
- (h) All of the furnaces shall combust only natural gas fuel.
- (i) The Permittee shall not melt any scrap from outside sources in any of their furnaces. Therefore, the source will not be classified as a secondary metal processing plant, one of the 28 listed source categories.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply to any of the furnaces.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-15]

Pursuant to 326 IAC 6-1-15 (Nonattainment Area Particulate Limitations for Howard County), the

following conditions shall apply:

- (a) The particulate matter (PM) emissions from the furnace 1ARF shall not exceed 0.39 grains per dry standard cubic foot of exhaust air and 22.5 tons per year.
- (b) The particulate matter (PM) emissions from the furnace 1BRF shall not exceed 0.39 grains per dry standard cubic foot of exhaust air and 22.5 tons per year.
- (c) The particulate matter (PM) emissions from the furnace 2RF shall not exceed 0.85 grains per dry standard cubic foot of exhaust air and 92.5 tons per year.
- (d) The particulate matter (PM) emissions from the furnace 5RF shall not exceed 0.85 grains per dry standard cubic foot of exhaust air and 92.5 tons per year.
- (e) The particulate matter (PM) emissions from the furnace 6RF shall not exceed 0.63 grains per dry standard cubic foot of exhaust air and 36.2 tons per year.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to this rule, the particulate matter (PM) emissions from each of the furnaces identified as 3RF, 4RF, 7RF, 8RF, 9RF, and 10RF shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform stack testing as shown in the table below using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.1.1, D.1.2, and D.1.3. PM10 includes filterable and condensable PM10. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Furnace Identification	Stack Tests Required	Time frame for stack testing
4RF	PM and PM10	Between the date of issuance of this permit and November 2004
either 2RF or 6RF	PM and PM10	Within 12 months after permit issuance
5RF	PM and PM10	Within 24 months after permit issuance
either 1ARF or 1BRF	PM and PM10	Within 36 months after permit issuance

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of all of the furnace stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the furnace stack exhausts once per shift.
- (b) To document compliance with Condition D.1.1, the Permittee shall maintain records of the metal remelted in each of the furnaces.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) one (1) natural gas-fired boiler, identified as 1BLR, constructed in 1964, with a maximum heat input capacity of 95 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1SB;
- (b) one (1) natural gas-fired boiler, identified as 2BLR, constructed in 1964, with a maximum heat input capacity of 81.26 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 2SB;
- (c) one (1) natural gas-fired boiler, identified as 3BLR, constructed in 2000, with a maximum heat input capacity of 77.9 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 3SB;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to 067-11163 issued September 30, 1999 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the boiler BLR3 shall combust only natural gas. Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from each of the boilers BLR1, BLR2, and BLR3 shall not exceed 0.01 grains per dry standard cubic foot of exhaust air.

D.2.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

Compliance Determination Requirements, Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Fuel Usage Records [326 IAC 12, (40 CFR 60.40c, Subpart Dc)]

- (a) Pursuant to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day of operation for boiler 3BLR.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) one (1) Pangborn shotblast machine, identified as DC1, constructed in 1968, with a maximum shotblast rate of 72 tons per hour, with emissions controlled by a scrubber;
- (b) one (1) Mesh Belt shotblast machine, identified as DC2, constructed in 1997, with a maximum shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter;
- (c) one (1) Mesh Belt shotblast machine, identified as DC6, constructed in 1997, with a maximum shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter;
- (d) one (1) Rotoblast shotblast machine, identified as DC3, constructed in 1994, with a maximum shotblast rate of 88,350 pounds per hour, with emissions controlled by cartridge filter;
- (e) one (1) Tumbleblast shotblast machine, also identified as DC5, constructed in 2000, with a maximum shotblast rate of 40,000 pounds per hour, with emissions controlled by cartridge filter;
- (f) one Wire Mesh machine used for deburring of parts, identified as DC4, constructed in 1999, with a maximum shotblast rate of 174,760 pounds per hour, with emissions controlled by a cartridge filter;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from the DC2 and DC6 mesh belt shotblasters shall be vented through a dedicated cartridge filter and shall not exceed 3.90 pounds per hour.
- (b) The PM10 emissions from the DC2 and DC6 mesh belt shotblasters shall be vented through a dedicated cartridge filter and shall not exceed 1.62 pounds per hour.
- (c) The PM emissions from the DC4 wire mesh shotblast machine shall be vented through a dedicated cartridge filter and shall not exceed 5.40 pounds per hour.
- (d) The PM10 emissions from the DC4 wire mesh shotblast machine shall be vented through a dedicated cartridge filter and shall not exceed 3.12 pounds per hour.
- (e) The PM emissions from the DC5 Tumbleblast shotblast machine shall be vented through a dedicated cartridge filter and shall not exceed 4.64 pounds per hour.
- (f) The PM10 emissions from the DC5 Tumbleblast shotblast machine shall be vented through a dedicated cartridge filter and shall not exceed 2.36 pounds per hour.

- (g) The PM emissions from the DC3 Rotoblast shall be vented through a dedicated cartridge filter and shall not exceed 4.48 pounds per hour.
- (h) The PM10 emissions from the DC3 Rotoblast shall be vented through a dedicated cartridge filter and shall not exceed 2.20 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.3.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the following conditions shall apply:

- (d) The particulate matter (PM) emissions from the wet scrubber controlling the shotblast machine identified as the DC1 Pangborn shotblast machine shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (e) The particulate matter (PM) emissions from the cartridge filter controlling the shotblast machine identified as the DC2 and DC6 Mesh belt shotblast machines shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (f) The particulate matter (PM) emissions from the cartridge filter controlling the shotblast machine identified as the DC3 Rotoblast shotblast machine shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (g) The particulate matter (PM) emissions from the cartridge filter controlling the shotblast machines identified as the DC5 Tumbleblast shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (h) Pursuant to Significant Source Modification 067-10648, issued June 18, 1999, the particulate matter (PM) emissions from the cartridge filter controlling the shotblast machine identified as the DC4 Wire mesh shotblast machine shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform stack testing as shown in the table below. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.3.1 and D.3.2. PM10 includes filterable and condensable PM10. These tests shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Shotblast Machine Identification	Stack Tests Required	Time frame for stack testing
wet scrubber DC1 controlling the DC1 Pangborn shotblast machine	PM	Within 36 months after permit issuance, then once every 5 years
cartridge filter DC4 controlling the wire mesh shotblast machine	PM and PM10	Within 36 months after permit issuance, then once every 5 years

D.3.5 Emission Controls

In order to comply with Conditions D.3.1 and D.3.2, the following conditions shall apply:

- (a) The wet scrubber for PM control shall be in operation and control emissions from the DC1 Pangborn shotblast machine at all times that the shotblast machine is in operation.
- (b) The cartridge filter for PM and PM10 control shall be in operation and control emissions from the DC2 and DC6 mesh belt shotblast machines at all times that either machine is in operation.
- (c) The cartridge filter for PM and PM10 control shall be in operation and control emissions from the DC3 Rotoblast shotblast machine at all times that the machine is in operation.
- (d) The cartridge filter for PM and PM10 control shall be in operation and control emissions from the DC5 Tumbleblast shotblast machines at all times that either machine is in operation.
- (e) The cartridge filter for PM and PM10 control shall be in operation and control emissions from the DC4 wire mesh shotblast machine at all times that the shotblast machine is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of all of the controlled stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of

this permit.

D.3.7 Scrubber Parametric Monitoring

The Permittee shall monitor and record the pressure drop of the scrubber, at least once per shift. When for any one reading, the pressure drop across the wet scrubber is outside the normal range of 0.5 to 2.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.8 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubber. All defective scrubber parts shall be replaced.

D.3.9 Scrubber Failure

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

D.3.10 Cartridge Filter Parametric Monitoring

The Permittee shall record the total static pressure drop across the cartridge filters controlling the shotblast machines, at least once per shift when the shotblasting process is in operation. When for any one reading, the pressure drop across the control device is outside the normal range of 0.5 to 2.5 inches of water or a range established during the latest stack test, Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.11 Cartridge Filter Inspections

An inspection shall be performed each calendar quarter of all cartridge filters controlling the shotblasting emissions. An inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridges shall be replaced.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.12 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the cartridge filters and wet scrubber stack exhausts once per shift.
- (b) To document compliance with Condition D.3.10, the Permittee shall maintain records of the cartridge filters differential static pressure once per shift.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the pressure drop readings of the scrubber once per shift.
- (d) To document compliance with Conditions D.3.8 and D.3.11, the Permittee shall maintain records of the results of the inspections required under Conditions D.3.8 and D.3.11 and the number and type of any parts replaced.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities as follows:

- (a) Die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, and 1997, with emissions uncontrolled and exhausting internally;
- (b) trim operations with emissions uncontrolled and exhausting internally;
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (e) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal; and
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; woodworking operations; tooling operations including dry grinding/sanding/cutting stations and wet grinding stations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from each of the emission units listed in this section shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.4.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from each of the die cast machines shall not exceed 0.153 pounds per hour.
- (b) The PM10 emissions from each of the die cast machines shall not exceed 0.153 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: DaimlerChrysler Corporation, Kokomo Casting Plant
Source Address: Chrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
Source Address: Chrysler Kokomo Transmission Plant
2401 S. Reed Road, Kokomo, Indiana 46904
Mailing Address: 1001 East Boulevard, Kokomo, Indiana 46904
Part 70 Permit No.: 067-5246-00065

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. This certification applies only to the facilities located at the DaimlerChrysler Kokomo Castings Plant.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: DaimlerChrysler Corporation, Kokomo Casting Plant
Source Address: Chrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
Source Address: Chrysler Kokomo Transmission Plant
2401 S. Reed Road, Kokomo, Indiana 46904
Mailing Address: 1001 East Boulevard, Kokomo, Indiana 46904

This form consists of 2 pages

Page 1 of 2

- | | |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12) |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| C | The Permittee must submit notice by mail or facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
Part 70 Quarterly Report**

Source Name: DaimlerChrysler Corporation, Kokomo Casting Plant
Source Address: Chrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
Source Address: Chrysler Kokomo Transmission Plant
2401 S. Reed Road, Kokomo, Indiana 46904
Mailing Address: 1001 East Boulevard, Kokomo, Indiana 46904
Part 70 Permit No.: 067-5246-00065
Facilities: Furnaces 1ARF, 1BRF, 2RF, 5RF and 6RF
Parameter: amount of metal melted
Limits: Furnaces 1ARF and 1BRF are limited to a combined total of 68,046 tons of metal per 12 consecutive month period;
Furnaces 5RF, 6RF, and 2RF are each limited to 109,482 tons of metal per 12 consecutive month period;

YEAR: _____

Month		Column 2	Column 3	Column 2 + Column 3
	Furnace Identification	This Month	Previous 11 Months	12 Month Total
Month 1	Furnaces 1ARF and 1BRF			
	Furnaces 5RF, 6RF, and 2RF			
Month 2	Furnaces 1ARF and 1BRF			
	Furnaces 5RF, 6RF, and 2RF			
Month 3	Furnaces 1ARF and 1BRF			
	Furnaces 5RF, 6RF, and 2RF			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR Quality
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: DaimlerChrysler Corporation, Kokomo Casting Plant
Source Address: Chrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
Source Address: Chrysler Kokomo Transmission Plant
2401 S. Reed Road, Kokomo, Indiana 46904
Mailing Address: 1001 East Boulevard, Kokomo, Indiana 46904
Part 70 Permit No.: 067-5246-00065

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name:	DaimlerChrysler Corporation Kokomo Casting Plant
Source Address:	DaimlerChrysler Kokomo Casting Plant 1001 East Boulevard, Kokomo, Indiana 46904
Source Address:	DaimlerChrysler Kokomo Transmission Plant 2401 S. Reed Road, Kokomo, Indiana 46904
County:	Howard
SIC Code:	3363
Operation Permit No.:	T067-5246-00065
Permit Reviewer:	Nisha Sizemore/Laura M. Groom

On November 1, 2001, the Office of Air Quality (OAQ) had a notice published in the Kokomo Tribune, Kokomo, Indiana, stating that DaimlerChrysler Corporation had applied for a Part 70 Operating Permit to operate an aluminum die cast facility which produces aluminum parts for automobile and truck transmissions as well as minor engine components. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 3, 2001, DaimlerChrysler Corporation submitted comments on the proposed Part 70 permit. On August 23rd, 2002, DaimlerChrysler Corporation submitted additional comments regarding the draft of the TSD Addendum. The summary of the comments is shown below:

Comment 1

DaimlerChrysler has a general comment that applies to the source name. The source is identified interchangeably as Chrysler or Daimler Chrysler throughout the Permit and Technical Support Document (TSD). The correct reference is DaimlerChrysler.

Response 1

The correction has been made throughout the permit.

Comment 2

DaimlerChrysler objects to IDEM's creation of new "applicable requirements," specifically new and more stringent emission limitations, in this draft Part 70 Operating Permit. It appears that new emission limits were created based upon IDEM's mistaken interpretation that federal New Source Review ("NSR") applied to artificial groups of projects undertaken at Kokomo Casting Plant (KCP). The NSR discussion included in the TSD indicates that IDEM considered total emissions from all projects undertaken during a calendar year and considered each year to be one permitting event. This is not appropriate as some projects that were installed in the same year were unrelated and should not be considered together. For example, in 1998, the installation of furnace 4RF was independent of the installation of the shotblast machines DC2 and DC6, which were also independent of the installation of the 9 die cast machines. Separate permits were

issued for the installation of furnace 4RF (which included a PSD review applicability at the time of permitting) and for the installation of the shotblast machines DC2 and DC6 (which also included a PSD applicability review).

It is appropriate to conduct a PSD review on a project-by-project basis (i.e., issued permits basis) and that review will indicate that each project was below the PSD applicability threshold. Detailed calculations are enclosed. The table below provides a summary of that analysis:

Permit	Source ID	Pollutant					
		NOX	CO	VOC	PM	PM10	SO2
326 IAC 6-1-15 (source Chrysler-Haynes)	1 ARF (Furnace A), 1 BR (Furnace B), 2RF (Furnace C), 5RF (Furnace F), 6RF (Furnace G)	32.41	27.23	1.30	266.20		0.19
067-4453	7RF, 8RF, 12 DCM	8.76	7.36	0.48	11.69		0.05
067-9188	9RF, 10RF, 10DCM	8.76	7.36	0.48	10.35		0.05
067-11990	4RF	8.76	7.36	0.48	20.15	13.83	0.05
067-8256	DC2, DC6						
067-10648	DC4, DC5				1.80		
34-06-87-0066	DC1				11.03		
067-3883	DC3				14.95		
N/Av	1BLR, 2BLR	38.60	64.85	4.25	13.65		0.46
067-11163	3BLR	17.06	28.66	1.88	2.56		0.20

Federal Regulations and USEPA Guidance Prohibit IDEM's retro active accumulation of emissions from separate projects. As noted above, the agency has included new "applicable requirements" in the draft Part 70 Operating Permit which are intended to maintain accumulated emissions below PSD significance thresholds from all projects undertaken during a calendar year. IDEM's proposed action to artificially combine unrelated and distinct projects and to accumulate or aggregate the emissions from those projects is prohibited by the federal PSD regulations and USEPA's interpretive guidance.

Since 1981, USEPA has directed state/federal permitting authorities that they should not accumulate the emissions from minor changes at existing facilities, i.e., those increases below PSD "significance" levels. Since its 1981 interpretation, USEPA has restated and clarified its position on several occasions.

In an interpretive memorandum dated September 18, 1989, USEPA discussed the proper method for calculating the "net emissions increase" for PSD applicability purposes and restated its policy that aggregation of projects and accumulation of de minimis emissions increases was not required. In that memo, USEPA stated:

Although the definition of "net emissions increase" could be interpreted differently, the Environmental Protection Agency's historic policy has been not to consider accumulated emissions from a series of small

(i.e., less than significant) emissions increases if the emissions increase from the proposed modification to the source is, standing alone without regard to any decreases, less than significant. In other words, the netting calculus (the summation of contemporaneous emissions increases and decreases) is not triggered unless there will be a significant emissions increase associated with the proposed modification.

USEPA's New Source Review Workshop Manual ("NSR Manual") contains a brief discussion of emissions accumulation. Once again, USEPA reiterated its policy that de minimis emissions increases which occur over time are not required to be accumulated together for purposes of PSD applicability:

If the proposed emissions increase at a major source is by itself (without considering any decreases) less than "significant," EPA policy does not require consideration of previous contemporaneous small (i.e., less than significant) emissions increases at the source. (See NSR Manual at Page A.36.)

KCP has recently determined that remelting of scrap metal will not be implemented in furnaces 7RF, 8RF, 9RF, and 10RF. This is reflected in the calculation of the potential emissions for permits 067-4453 and 067-9188.

Rule 326 IAC 6-1-15 identifies KCP as "Chrysler-Haynes" and provides limits on allowable PM emissions for Furnaces 1ARF, 1BRF, 2RF, 5RF, and 6RF. The furnaces are identified in the rule as Furnace A, B, C, F, and G, respectively. Therefore, it is not appropriate to evaluate these operations against PSD applicability limits.

If KCP has emissions limits contained in previously issued Construction Permits (CPs), it is appropriate to include such limits in this Part 70 permit. The two tables below present emissions limits contained in the issued CPs for the furnaces and the shotblast machines.

Furnace ID	CP No.	Limits				
		PM (lb/hr)	PM10 (lb/ton melt)	Remelt (tons/hr)	PM (tons/yr)	Grain Loading
1ARF	N/AP - 326 IAC 6-1-15 (Furnace A)				22.5	0.39
1BRF	N/AP - 326 IAC 6-1-15 (Furnace B)				22.5	0.39
2RF	N/AP - 326 IAC 6-1-15 (Furnace C)				92.5	0.85
4RF	067-11990	4.6	0.53	6.5		0.03
5RF	N/AP - 326 IAC 6-1-15 (Furnace F)				92.5	0.85
6RF	N/AP - 326 IAC 6-1-15 (Furnace G)				36.2	0.63
7RF	067-4453					0.03
8RF	067-4453					0.03
9RF	067-9188					0.03
10RF	067-9188					0.03

The limits shown in the table above should replace the limits for the furnaces in Condition D.1.1.

SHOTBLAST LIMITS IN ISSUED CP

Shotblast ID	Unit Description	CP No.	Limits	
			PM (lb/hr)	Grain Loading
DC1	Pangborn	OP 34-06-87-0066		
DC2	Mesh Belt (CP ID DC2)	067-8256	2.7	
DC3	Rotoblast (CP ID Wheelabrator Tumbblast)	067-3883	3.42	
DC4	Wire Mesh (CP ID DC4)	067-10648	0.13	0.03
DC5	Tumble Blast (CP ID DC3)	067-10648	0.41	0.03
DC6	Mesh Belt (CP ID DC2)	067-8256	2.7	

The tables above provide the limits that should be contained in the Part 70 permit. Any additional emissions limits are not appropriate and should be eliminated from the Part 70 permit. Specifically, the limits for the shotblast machines shown in the above table should replace the limits for the shotblast machines in Condition D.3.1.

IDEM's Attempts to Create New "Applicable Requirements" Would Result in a Prohibited "Supersession" of Existing Requirements. The proposed draft Part 70 Operating Permit would include new emissions limitations created to address IDEM's mistaken interpretation of the federal NSR permitting requirements. By creating new emission limitations, the draft Part 70 Permit eliminates the emission limitations included in Construction Permits issued for the subject equipment or processes. The new emission limitation would also replace emission limitations mandated by Indiana SIP requirements that were included in those Construction Permits. IDEM's proposed creation of new emission limits will violate the federal Title V Operating Permit regulations and USEPA guidance prohibiting "supersession" of applicable requirements.

USEPA's interpretive guidance issued on May 20, 1999 (5/20/99 correspondence from USEPA's J. Seitz to R. Hodanbosi and C. Lagges of STAPPA/ALAPCO), clearly stated the legal basis for the "supersession" prohibition:

It is the Agency's view that title V permits may not supersede, void, replace, or otherwise eliminate the independent enforceability of terms and conditions in SIP-approved permits. To assure compliance with "applicable requirements" such as SIP-approved permit terms and conditions, title V permits must record those requirements, but may not eliminate their independent existence and enforceability under title I of the Clean Air Act (i.e., may not supersede them). Title V permits may state that they "subsume" or "incorporate" SIP-approved permit terms and conditions as EPA interprets such statements to mean that the title V permit includes all SIP-approved permit terms, but does not supersede, void, replace, or otherwise eliminate their independent legal existence and enforceability. Regardless of terminology, to the extent that title V permits are used to accomplish

the legal result of supersession, EPA believes that such use is improper. . . . SIP-approved permits must remain in effect because they are the legal mechanism through which underlying NSR requirements (from the Act, federal regulations and federally-approved SIP regulations) become applicable, and remain applicable, to individual sources. NSR programs provide the relevant permitting entity with the authority to impose source-specific NSR terms and conditions in legally enforceable permits, and provide States, EPA and citizens with the authority to enforce these permits. Because State title V programs do not provide the authority for the establishment and maintenance of SIP-approved permit requirements, the title V permit cannot "assure compliance" with those requirements unless the underlying implementation and enforcement mechanism for the NSR requirements--the SIP-approved permit--remains valid.

Response 2

IDEM has established an EPA-approved protocol for the procedures to be used when incorporating the provisions of previously issued permits into Part 70 Operating Permits and for combining new source review permits with Part 70 Operating Permits. Individual provisions of previously issued permits may be incorporated as originally stated, revised, or deleted as described by these procedures. Indiana may supersede previously issued permits in whole or in part under these procedures, as long as the TSD identifies the previously established applicable requirements that will be revised or deleted and the basis for the revisions or deletions. Pursuant to the requirements of 326 IAC 2-1.1-9.5, IDEM can modify the conditions of previously issued permits.

Pursuant to 326 IAC 2-1.1-9.5 permits will indicate:

- a. that except as provided in IC 13-15-3-6(a), permits are effective for a term not to exceed five (5) years.
- b. that any condition established in a permit issued pursuant to a permitting program approved into the Indiana SIP shall remain in effect until:
 - (1) the condition is modified in a subsequent permit action; or
 - (2) the emission unit to which the condition pertains permanently ceases operation.

Some previous permits that were issued to this source stated that 326 IAC 6-3-2 (Process Operations) applied to some of the emission units. Those limits have not been included in the Part 70 permit because 326 IAC 6-3-2 (Process Operations) is not the applicable rule. Since the source is located in Howard County and has actual particulate emissions greater than ten tons per year, the correct applicable rule for those emission units not specifically listed in 326 IAC 6-1-15 is 326 IAC 6-1-2. The limits pursuant to 326 IAC 6-1-2 have been included in the Part 70 permit. The public notice for this Part 70 permit stated that some NSR requirements were being corrected through the Part 70 permit. The technical support document explained these changes and the reasons for each. The Part 70 permit Condition B.13 (Permit Shield) lists the requirements that are no longer applicable. Therefore, IDEM has met the requirements of the Part 70 rules for revising NSR requirements through a Part 70 permit.

Many of the emission units at this source require federally enforceable limits on potential to emit (PTE) in order to render the requirements of PSD not applicable. Previous permits for many of these units did not include the necessary limits to render PSD not applicable; therefore, those limits are being included in the Part 70 permit now as additional requirements. Failure to include such limits in the permit could leave the Permittee open to the risk of possible EPA or IDEM enforcement actions, or citizens' suits, because the PTE of some units would exceed the PSD significance levels without those units ever having complied with the requirements of PSD.

However, the Permittee did provide sufficient justification in its August 23rd, 2002 additional information letter, to change the years of construction on some facilities. Also, Furnace 4RF was separated out of the 1998 modifications because it was installed to replace the previous furnace 4 which was destroyed in an unforeseeable catastrophic failure. This resulted in a change of some limits.

After reviewing the additional comments submitted by the Permittee in August of 2002. It was decided that the Permittee did not provide sufficient justification on why the other projects constructed in the same year were unrelated.

The Permittee also explained that some furnaces previously described as having remelt capability, actually do not have remelt capability (see comment #6). This changes the potential to emit for these units. As a result, some of these units no longer require additional emission limits to render PSD not applicable. See response #6 for details on this issue.

The following table shows the limits necessary to render PSD not applicable to the 1995 modification.

1995 Modification				
Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Furnaces 7RF and 8RF	8.7 (each)	8.7 (each)	20.309 10.15 (each)	10.309 5.15 (each)
seven die cast machines	4.69	4.69	4.69	4.69
Total	22.09	22.09	24.999	14.999

Furnaces 7RF and 8RF:

PM: $10.15 \text{ tons/yr} / 8760 \text{ hrs/yr} \times 2000 \text{ lb/ton} = 2.32 \text{ lbs/hr each}$

PM10: $5.15 \text{ tons/yr} / 8760 \text{ hrs/yr} \times 2000 \text{ lb/ton} = 1.18 \text{ lbs/hr each}$

Die cast machines:

PM: $4.69 \text{ tons/yr} / 7 \text{ machines} / 8760 \text{ hrs/yr} \times 2000 \text{ lbs/ton} = 0.153 \text{ lbs/hr per machine}$

PM10: $4.69 / 7 \text{ machines} / 8760 \text{ hrs/yr} \times 2000 \text{ lbs/ton} = 0.153 \text{ lb/hr per machine}$

The following table shows the limits necessary to render PSD not applicable to the 1997 modification.

1997 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Furnaces 9RF and 10RF DC2 and DC6 mesh belt shotblast	8.7 (each) 13.52 (total)	8.7 (each) 13.52 (total)	19.34 17.1 (total)	9.34 7.1 (total)
Furnace 3RF	7.8	7.8	4.69 7.8	4.69 7.8
Total	25.4 21.3	25.4 21.3	24 24.9	14 14.9

DC2 and DC6 shotblasts:

PM: 17.1 tons/yr x 2000 lb/ton / 8760 hrs/yr = 3.90 lb/hr (total for both)

PM10: 7.1 tons/yr x 2000 lb/ton / 8760 hrs/yr = 1.62 lb/hr (total for both)

Furnace 3RF:

PM/PM10: 7.8 tons/yr / 1.5 tons metal/hr x 2000 lb/ton / 8760 hrs/yr = 1.19 lb/ton metal

The following table shows the limits necessary to render PSD not applicable to the 1998 modification.

1998 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
DC2 and DC6 mesh belt shotblast Furnaces 9RF and 10RF	13.52 8.7 (each)	13.52 8.7 (each)	2.00 9.435 (each)	2.00 4.48 (each)
Furnace 4RF	20.4	20.4	15.97	5.97
nine die cast machines	6.03	6.03	6.03	6.03
Total	39.65 23.43	39.65 23.43	24 24.9	14 14.99

Furnaces 9RF and 10RF:

PM: 9.435 tons/yr /8760 hrs/yr x 2000 lb/ton = 2.15 lbs/hr each

PM10: 4.48 tons/yr /8760 hrs/yr x 2000 lb/ton = 1.02 lbs/hr each

PM: 6.03 tons/yr / 9 machines / 8760 hrs/yr x 2000 lbs/ton = 0.153 lbs/hr per machine

PM10: 6.03 / 9 machines / 8760 hrs/yr x 2000 lbs/ton = 0.153 lb/hr per machine

The following table shows the limits necessary to render PSD not applicable to the 1998 replacing of furnace 4RF.

1998 Furnace 4RF Replacement

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Furnace 4RF	20.1	20.1	24.9	14.9

PM: 24.9 tons/yr / 6.5 tons remelt/hr x 2000 lb/ton / 8760 hrs/yr = 0.875 lb/ton

PM10: 14.9 ton/yr / 6.5 tons remelt/hr x 2000 lb/ton / 8760 hrs/yr = 0.527 lb/ton

Following is a summary of the changes to the permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

- (i) one (1) natural gas-fired aluminum reverberatory furnace, identified as 9RF, constructed in ~~1997~~ **1998**, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (j) one (1) natural gas-fired aluminum reverberatory furnace, identified as 10RF, constructed in ~~1997~~ **1998**, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (o) one (1) Mesh Belt shotblast machine, identified as DC2, constructed in ~~1998~~**1997**, with a maximum capacity of 13,586 pounds of aluminum parts per hour, with emissions controlled by a cartridge filter DC2 and exhausting to stack DC2;
- (p) one (1) Mesh Belt shotblast machine, identified as DC6, constructed in ~~1998~~**1997**, with a maximum capacity of 13,586 pounds of aluminum parts per hour, with emissions controlled by a cartridge filter DC6 and exhausting to stack DC6;

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

- (b) die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, ~~1997~~, **1998** and 2001, with emissions uncontrolled and exhausting internally;

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1ARF, constructed in 1988, with a maximum capacity of 1 ton per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (b) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1BRF, constructed in 1988, with a maximum capacity of 1 ton per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (c) one (1) natural gas-fired aluminum reverberatory furnace, identified as 2RF, constructed in 1984, with a maximum capacity of 30 tons per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 2RF and 2RCW;
- (d) one (1) natural gas-fired aluminum reverberatory furnace, identified as 4RF, constructed in 1998, with a maximum melt rate of 6.5 tons of aluminum and granular flux per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 4RF and 4RCW;
- (e) one (1) natural gas-fired aluminum reverberatory furnace, identified as 5RF, constructed in 1978, with a maximum capacity of 20 tons per hour and a maximum heat input capacity of 18 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 5RF and 5RCW;
- (f) one (1) natural gas-fired aluminum reverberatory furnace, identified as 6RF, constructed in 1983, with a maximum capacity of 30 tons per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 5RF/6RCW;
- (g) one (1) natural gas-fired aluminum reverberatory furnace, identified as 7RF, constructed in 1995, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 7RF;
- (h) one (1) natural gas-fired aluminum reverberatory furnace, identified as 8RF, constructed in 1995, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 8RF;
- (i) one (1) natural gas-fired aluminum reverberatory furnace, identified as 9RF, constructed in ~~1997~~ 1998, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (j) one (1) natural gas-fired aluminum reverberatory furnace, identified as 10RF, constructed in ~~1997~~ 1998, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (k) one (1) natural gas-fired aluminum reverberatory furnace, identified as 3RF, constructed in 1997, with a maximum capacity of 1.5 tons per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 3RF and 3RCW;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of PSD not applicable, the following conditions shall apply:

- (a) The furnaces shall comply with the PM, PM10, and production limits as shown in the table below.

Furnace Identification	PM limit (lbs/ton of metal)	PM10 limit (lbs/ton of metal)	Production limit (tons of metal per 12 consecutive month period)	Production Limit for First 12 months after issuance of this permit (tons of metal per month)
5RF	0.457	none	109,482	9,123.5
6RF	0.457	none	109,482	9,123.5
2RF	0.457	none	109,482	9,123.5
1ARF and 1BRF	2.35 (each)	none	68,046 (for both furnaces combined)	5,670.5 (for both furnaces combined)
7RF and 8RF	2.632 (each)	1.336 (each)	15,431 (For both furnaces combined)	1286 (For both furnaces combined)
9RF, 10RF and 3-RF	2.050 (each)	1.230 (each)	20,864 (For all three furnaces combined)	1730.3 (For all three furnaces combined)
4RF	0.720 0.875	0.720 0.527	22,149 not applicable	not applicable

- (b) The furnaces shall comply with the PM and PM10 limits shown in the following table.

Furnace Identification	PM limit (lbs/hr)	PM10 limit (lbs/hr)
9RF and 10RF	2.15 (each)	1.02 (each)
7RF and 8RF	2.32 (each)	1.18 (each)
3RF	1.19	1.19

- ~~(b)~~(c) The PM limit for furnace 4RF shall supersede the requirements of Condition D.9.1(b)(1) of Construction Permit CP067-10006-00065 issued December 7, 1998.

- ~~(c)~~(d) The PM10 limit for furnace 4RF shall supersede the requirements of Condition D.9.1(b)(2) of Construction Permit CP067-10006-00065 issued December 7, 1998.

- ~~(d)~~(e) The scrap metal rate of furnace 4RF shall not exceed 6.5 tons per hour.
- ~~(e)~~(f) Furnace 4RF shall melt only clean scrap generated on-site.
- (g) Upon construction and operation of the proposed furnace No. 4, Furnace D shall be permanently taken out of service.**
- ~~(f)~~(h) All of the furnaces shall combust only natural gas fuel.
- ~~(g)~~(i) The Permittee shall not melt any scrap from outside sources in any of their furnaces. Therefore, the source will not be classified as a secondary metal processing plant, one of the 28 listed source categories.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply to any of the furnaces.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) one (1) Pangborn shotblast machine, identified as DC1, constructed in 1968, with a maximum shotblast rate of 72 tons per hour, with emissions controlled by a scrubber;
- (b) one (1) Mesh Belt shotblast machine, identified as DC2, constructed in 1997, with a maximum shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter;
- (c) one (1) Mesh Belt shotblast machine, identified as DC6, constructed in 1997, with a maximum shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter;
- (d) one (1) Rotoblast shotblast machine, identified as DC3, constructed in 1994, with a maximum shotblast rate of 88,350 pounds per hour, with emissions controlled by cartridge filter;
- (e) one (1) Tumbleblast shotblast machine, identified as DC5, constructed in 2000, with a maximum shotblast rate of 40,000 pounds per hour, with emissions controlled by cartridge filter;
- (f) one Wire Mesh machine used for deburring of parts, identified as DC4, constructed in 1999, with a maximum shotblast rate of 174,760 pounds per hour, with emissions controlled by a ~~baghouse~~ **a cartridge filter**;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from the DC2 and DC6 mesh belt shotblasters shall be vented through a dedicated cartridge filter and shall not exceed ~~2.54~~ **3.90** pounds per hour.
- (b) The PM10 emissions from the DC2 and DC6 mesh belt shotblasters shall be vented through a dedicated cartridge filter and shall not exceed ~~0.23~~ **1.62** pounds per hour.
- (c) The PM emissions from the DC4 wire mesh shotblast machine shall be vented through a dedicated ~~baghouse~~ **cartridge filter** and shall not exceed 5.40 pounds per hour.
- (d) The PM10 emissions from the DC4 wire mesh shotblast machine shall be vented through a dedicated ~~baghouse~~ **cartridge filter** and shall not exceed 3.12 pounds per hour.
- (e) The PM emissions from the DC5 Tumbleblast shotblast machine shall be vented through a dedicated cartridge filter and shall not exceed 4.64 pounds per hour.
- (f) The PM10 emissions from the DC5 Tumbleblast shotblast machine shall be vented through a dedicated cartridge filter and shall not exceed 2.36 pounds per hour.
- (g) The PM emissions from the DC3 Rotoblast shall be vented through a dedicated cartridge filter and shall not exceed 4.48 pounds per hour.
- (h) The PM10 emissions from the DC3 Rotoblast shall be vented through a dedicated cartridge filter and shall not exceed 2.20 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities as follows:

- (a) Die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, and 1997, with emissions uncontrolled and exhausting internally;
- (b) trim operations with emissions uncontrolled and exhausting internally;
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (e) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal; and
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; woodworking operations; tooling operations including dry grinding/sanding/cutting stations and wet grinding stations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from each of the die cast machines shall not exceed 0.153 pounds per hour.**
- (b) The PM₁₀ emissions from each of the die cast machines shall not exceed 0.153 pounds per hour.**

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

Comment 3

The requirement to monitor the pressure drop for the control devices associated with the shotblast units is unwarranted and overly burdensome and should be deleted from KCP's Part 70 permit. Periodic stack testing combined with daily visible emissions observations set forth in the permit constitute adequate periodic monitoring because it occurs on a regular basis and is capable of providing a reasonable assurance of compliance.

The Agency should not impose the most stringent periodic monitoring requirements without considering the specific characteristics of the emissions unit to be monitored or the realities of implementing those monitoring requirements at the permitted facility. For most equipment, there are several different types of monitoring methods or procedures required with no additional assurance of predicting, maintaining or documenting compliance.

We are not aware of any published IDEM guidance that would require the imposition of stringent and duplicative monitoring requirements without considering technical feasibility of the monitoring method, economic burden and safety issues imposed on the facility operator and without a direct correlation to predicting, maintaining or documenting compliance. It is agreed that monitoring required by an "applicable requirement" must be included in the Part 70 Operating Permit. Where no monitoring is specified however, the permit needs to include only that level and type of "...periodic monitoring specifications sufficient to yield reliable data from the relevant time period that are representative of the source's compliance." The monitoring must assure only that "reasonable information is provided" to evaluate compliance (See 326 IAC 2-7-5). DaimlerChrysler believes that the monitoring requirements proposed by IDEM to be included in the Part 70 Operating Permit are in excess of what is required by the controlling state regulation, and go beyond the scope of IDEM's authority.

Further, the monitoring requirements proposed by IDEM to be included in the Part 70 Operating Permit are not mandated by the Clean Air Act, the implementing federal regulations or by any guidance issued by the U.S. Environmental Protection Agency ("USEPA"). As you know, USEPA's September 15, 1998 "Periodic Monitoring Guidance for Title V Operating Permits Program" was set aside by the D.C. Circuit Court of Appeals as improperly expanding the scope and stringency of what is required as "periodic monitoring." Although set aside, that guidance identifies several criteria to be considered by the permitting authority in evaluating the "appropriate periodic monitoring methodology." When those criteria are applied to the emissions sources and control equipment included in the pre-draft permit, those criteria support the use of stack testing combined with a single, parametric monitoring requirement (e.g., visible emissions notations) as adequate compliance monitoring, without the need for pressure drop readings.

Periodic stack testing combined with a single parametric monitoring method constitutes adequate periodic monitoring because they will occur on a regular basis and provide a reasonable assurance of compliance. Furthermore, a per-shift frequency for these parameters is overly burdensome as well and does not improve the effectiveness of the monitoring program in this particular case. Clearly, the appropriateness of any monitoring parameter and its frequency should be evaluated on a case-by-case basis and DaimlerChrysler believes that for those particulate matter sources at KCP subject to a periodic monitoring requirement, daily visible emissions notations in conjunction with periodic stack testing is the most appropriate monitoring program. The following should also be considered:

The requirement for per shift visible emission notations creates technical issues, safety concerns and unjustified costs. These issues include the difficulty of conducting observations during inclement weather, the requirement for safe access to and exit from the facility rooftops (during winter months and inclement weather), and the manpower that would be required to take and record hundreds of "observations" during a normal work week for the second and third shifts. These issues are substantially minimized if the requirement is of daily frequency.

The shotblast operations (which these issues affect) have very little variability and are designed as "steady state" operations.

The contiguous DaimlerChrysler Kokomo Transmission Plant (KTP) was issued its Part 70 Operating Permit (No. T067-6504-00065) on September 2, 1999. This permit requires KTP to conduct daily visible emissions notations and to monitor pressure drop for control devices associated with shot blast units on a weekly basis. These requirements have proven to be more than is necessary to assure the continued proper operation of the particulate matter control devices. Our experience confirms that pressure drop and visible emission notations combined do not enhance compliance assurance relative to using only a single monitoring parameter.

It is KTP's and KCP's experience that the requirement to obtain pressure drop readings is extremely burdensome without providing a corresponding increase in the assurance of compliance. The pressure drop gauges require intensive maintenance to keep them operational and if a gauge fails a calibration check it cannot be serviced on site but must be sent back to the manufacturer for re-calibration. As a result KTP has been required to purchase and install replacement gauges for use following the calibration checks.

In short, even USEPA's Periodic Monitoring guidance would require no more than periodic stack testing combined with daily visible emissions notations (or other suitable parametric monitoring requirement). This combination of monitoring will allow DaimlerChrysler to fully assess and assure compliance with the applicable requirements of the Part 70 operating permit.

The following specific revisions are suggested:

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of all of the furnace stack exhausts shall be performed once per ~~shift~~ day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the furnace stack exhausts once per ~~shift~~ day.

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of all of the controlled stack exhausts shall be performed once per ~~shift~~ day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

DaimlerChrysler has concerns regarding the following conditions as written; however, since this condition is requested to be removed, further discussion regarding our concerns is not necessary unless IDEM disagrees

with our request.

D.3.7—Scrubber Parametric Monitoring

~~The Permittee shall monitor and record the pressure drop of the scrubber DC1, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pressure drop reading is outside of the normal range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C—Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAG, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAG, and shall be calibrated at least once every six (6) months.~~

For the reasons discussed above, DaimlerChrysler is requesting the following condition to be removed from the permit. Additionally, all shotblast machines are controlled by cartridge filters and none are controlled by baghouses.

D.3.10—Baghouse and Cartridge Filter Parametric Monitoring

~~The Permittee shall record the total static pressure drop across the baghouse DC4 and cartridge filters DC2, DC3A, and DC3B controlling the shotblast machines, at least once per shift when the shotblasting process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within the range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C—Compliance Monitoring Plan—Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~The instrument used for determining the pressure shall comply with Section C—Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAG, and shall be calibrated at least once every six (6) months.~~

D.3.13 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the control device baghouse, cartridge filters, and wet scrubber stack exhausts once per shift day.~~
- ~~———— (b) To document compliance with Condition D.3.10, the Permittee shall maintain records of the baghouse and cartridge filter differential static pressure once per shift.~~
- ~~———— (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the pressure drop readings of the scrubber once per shift.~~

Response 3

IDEM is aware of the ruling by the D.C. Circuit Court of Appeals to set aside EPA's September 15, 1998 "Periodic Monitoring Guidance for Title V Operating Permits Program." However, the court's ruling does not affect IDEM's ability to require compliance monitoring for Part 70 sources because the authority provided by Indiana's Part 70 rules at 326 IAC 2-7-5 is more broad than the corresponding federal Part 70 rules, with respect to compliance monitoring requirements. Also, IDEM never relied on EPA's 1998 guidance.

The requirements to monitor the pressure drop across the cartridge filters and also observe visible emissions from the cartridge filter stacks are not duplicative monitoring. Visible emission notations are used to indicate compliance with 326 IAC 5-1 (Opacity) and particulate matter limits, while monitoring of the pressure drop of the cartridge filters provides an indication of whether the control device is operating properly. Since particulate limits are very low for these units, an observation that visible emissions are "normal" would not necessarily indicate compliance with the particulate limit, especially in the case where the control device might be operating at less than peak levels (which could be indicated by monitoring the pressure drop). Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the cartridge filter. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could result in damage to the cartridges if not properly addressed. Therefore, the OAQ believes that pressure drop readings should be taken at least once per shift, in addition to the visible emission observations. The requirements to measure the pressure drops across the cartridge filters will remain unchanged in the permit.

The Permittee also objects to the once per shift frequency of the visible emission notations on the grounds that during inclement weather (such as rain or fog) it might be necessary to access the roof to observe the emissions from some stacks, and such a practice would result in unsafe conditions for plant personnel. IDEM agrees that it could be unsafe for employees to access the roof during inclement weather; however, the condition does not require the Permittee to perform visible emission notations during these times. The condition specifically says that "Visible emission notations of all of the furnace stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere." This means that whenever it is NOT "daylight conditions" for any reason (including times of inclement weather), the Permittee is not required to perform the visible emission notations. During such times, the Permittee should make a note in the record that visible emissions could not be performed because daylight conditions did not exist due to inclement weather. There has been no change to the frequency of the required visible emission notations.

Comment 4

Many of the sources (i.e., facilities) with control devices have separate Source/Device ID's associated with the control devices. DaimlerChrysler is requesting that all references to these ID's be removed from the Part 70 permit. Retaining this identification system would result in the need for KCP to request an administrative amendment to the Part 70 permit whenever a control device is replaced or a facility (i.e., process) is directed to a different control device. Replacement of a control device is explicitly exempt from permit requirements per 326 IAC 2-1.1-3(g)(2), which states that a minor physical change (i.e., replacement of air pollution control device) which does not increase the potential to emit is exempt from an operating permit revision. For purposes of this document, references to control device ID's have been struck out in conditions that KCP is commenting on for other reasons, but all control device ID's in the Part 70 permit should be eliminated.

The control device system for some of the shotblast units are setup such that emissions from a shotblast machine can be rerouted to another cartridge filter should the need arise. In such an instance, KCP would be required to submit an administrative amendment notifying IDEM of the temporary change and would have to submit another administrative amendment when the emissions are routed back to the original cartridge filter. Therefore, DaimlerChrysler is requesting a general condition that requires the use of the control devices at all times the shotblast units are in operation as suggested below:

D.3.5 Emission Controls

In order to comply with Conditions D.3.1 and D.3.2, no shotblast machine shall be operated unless the PM control device it is discharging to is also in operation. the following conditions shall apply:

- (a) ~~The wet scrubber DC1 for PM control shall be in operation and control emissions from the DC1 Pangborn shotblast machine at all times that the shotblast machine is in operation.~~
- (b) ~~The cartridge filter DC2 for PM and PM10 control shall be in operation and control emissions from the DC2 and DC6 mesh belt shotblast machines at all times that either machine is in operation.~~
- (c) ~~The cartridge filter DC3A for PM and PM10 control shall be in operation and control emissions from the DC3 Rotoblast shotblast machine at all times that the machine is in operation.~~
- (d) ~~The cartridge filter DC3B for PM and PM10 control shall be in operation and control emissions from the DC5 Tumbleblast shotblast machines at all times that either machine is in operation.~~
- (e) ~~The baghouse DC4 for PM and PM10 control shall be in operation and control emissions from the DC4 wire mesh shotblast machine at all times that the shotblast machine is in operation.~~

Additionally, DaimlerChrysler requests the following clarifications to permit conditions:

D.3.9 Scrubber Failure

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been repaired, replaced, or emissions have been redirected to an alternate control device as appropriate.

D.3.12 Broken or Failed ~~Bag~~ Cartridge Filter Detection

In the event that ~~bag~~ failure has been observed.

- (a) For multi-compartment cartridge filters ~~units~~, the affected compartments will be shut down immediately until the failed units have been repaired, ~~or replaced, or emissions have been redirected to an alternate control device.~~ Operations may continue only if there are no visible emissions or if the event qualifies as an emergency ~~or if emissions have been redirected to an alternate control device~~ and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions)....
- (b) For single compartment cartridge filters ~~baghouses~~, failed units and the associated process will be shut down immediately until the failed units have been repaired, ~~or replaced, or emissions have been redirected to an alternate control device.~~ Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions) or if emissions have been redirected to an alternate control device.

Response 4

Many of the emission units in the permit have individual particulate matter limits in order to render the requirements of PSD not applicable. In order to demonstrate compliance with those limits, IDEM is requiring stack testing of some of those facilities. If periodic stack testing is performed showing compliance with the limits, then appropriate compliance monitoring is performed indicating that the emission unit and control

device continue to operate in a similar manner as they did during the compliant stack test, then credible evidence of continued compliance exists. However, if emissions were suddenly redirected such that a control device that only controlled one emission unit during a stack test would suddenly control emissions from two or more emission units, then the original stack test results could not be used as credible evidence of compliance. Since the control device was tested while controlling only one emission unit, IDEM would have no way of knowing whether the control device could really handle the additional load from the extra emission units. Another stack test would be necessary to determine if this new control scenario would show compliance with the permit limits. Further, DaimlerChrysler proposes to be able to make such changes without prior approval from IDEM. This also causes a problem because many of the emission units in the permit have individual emission limits in order to render PSD not applicable. If these units were part of separate modifications, then the limits cannot be added together, allowing DaimlerChrysler to show compliance with only the sum total of both. Because there would be no way to practically enforce the limits on the individual emission units, the permit does not allow the flexibility to redirect emissions from one emission unit to another control device that already controls another emission unit. However, it would be acceptable for DaimlerChrysler to replace a cartridge filter with another cartridge filter that had the same level of control. Therefore, the control device IDs do not need to remain in the permit, as long as the permit states that each unit (or group of units) maintains dedicated control devices. The control device IDs have been deleted from the descriptions of the emission units and all other permit conditions in Section D.3. In addition, the following changes have been made to Condition D.3.1.

D.3.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from the ~~cartridge filter DC2 controlling the DC2 and DC6 mesh belt shotblasters~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 3.90 pounds per hour.
- (b) The PM10 emissions from the ~~cartridge filter DC2 controlling the DC2 and DC6 mesh belt shotblasters~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 1.62 pounds per hour.
- (c) The PM emissions from the ~~baghouse DC4 controlling the DC4 wire mesh shotblast machine~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 5.40 pounds per hour.
- (d) The PM10 emissions from the ~~baghouse DC4 controlling the DC4 wire mesh shotblast machine~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 3.12 pounds per hour.
- (e) The PM emissions from the ~~cartridge filter DC3B controlling the DC5 Tumbleblast shotblast machine~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 4.64 pounds per hour.
- (f) The PM10 emissions from the ~~cartridge filter DC3B controlling the DC5 Tumbleblast shotblast machine~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 2.36 pounds per hour.
- (g) The PM emissions from the ~~cartridge filter DC3A controlling the DC3 Rotoblast~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 4.48 pounds per hour.
- (h) The PM10 emissions from the ~~cartridge filter DC3A controlling the DC3 Rotoblast~~ **shall be vented through a dedicated cartridge filter and** shall not exceed 2.20 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

The Broken or Failed Bag Detection Condition is being deleted because the Permittee uses cartridges instead of Bag Filters.

~~D.3.12 Broken or Failed Bag Detection~~

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.~~
- ~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).~~

Comment 5 Section A.1

Section A. 1 of the Draft Part 70 Operating permit includes a reference to the DaimlerChrysler Kokomo Casting Plant and the DaimlerChrysler Kokomo Transmission Plant as having "been combined . . . as one Title V source." This statement is not factually or legally accurate and the language should be revised and supplemented.

The Kokomo Casting Plant and the Kokomo Transmission Plant are considered by IDEM to be a single "major source" as that term currently is defined by Indiana regulations at 326 IAC 2-7-1(22). In fact, these two facilities are completely different types of manufacturing operations (i.e., separate SIC codes: 3363 and 3714, respectively) and are subject to independent management personnel and structure. The two plants are considered a major Title V source because of potential HAP emissions.

DaimlerChrysler reserves its right to demonstrate that the two facilities are individual and independent manufacturing operations, should there be a change to the regulatory definition of "major source" for purposes of the Part 70 Operating Permit program. In addition, DaimlerChrysler reserves its right to demonstrate that these two facilities are individual, discrete and independent emissions sources under other state and federal air quality and/or permitting programs. It is important to recognize that a physical or operational change at the Kokomo Casting Plant is not necessarily related to or a component of a physical or operational change at the Kokomo Transmission Plant. The suggested revisions are presented below:

"The Permittee owns and operates an aluminum die cast facility, including melt furnaces, machinery, and cleaning and heat treating equipment to produce rough cast transmissions cases and parts for use in automobiles and light-duty trucks.

Responsible Official:

James E. Reed, Jr.

Source Address: DaimlerChrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
~~Source Address: Chrysler Kokomo Transmission Plant~~
~~2401 S. Reed Road, Kokomo, Indiana 46904~~
Mailing Address: 1001 East Boulevard, Kokomo, Indiana 46904"

As discussed above, the source does not consist of 2 plants and therefore, DaimlerChrysler is requesting the following revisions:

"This source consists of ~~two (2) plants~~:

- (a) ~~The Kokomo Transmission Plant (KTP) is located at 2401 S. Reed Road, Kokomo, IN 46904; and~~
- (b) The Kokomo Casting Plant (KCP) is located at 1001 East Boulevard, Kokomo, IN 46904

KCP is considered a contiguous facility to the Kokomo Transmission Plant, located at 2401 S. Reed Road, Kokomo IN, 46904. Both plants have the same source identification number, which is 067-00065, as Since the two (2) plants are located on contiguous properties, KCP is acting as a support facility for KTP since more than 50% of its output goes to KTP, and the two plants are under common control of the same entity, they will be considered one (1) source. The two plants have also been considered as one single major source in previous permit approvals. The two plants have different SIC codes, are managed by separate plant managers, are operated as individual facilities, and hold separate air permits.

Separate Part 70 permits are being issued to DaimlerChrysler Corporation, Kokomo Transmission Plant and ~~DaimlerChrysler Corporation, Kokomo Casting Plant solely for administrative purposes.~~ The Part 70 Permit No.: T067-6504-00065 for Chrysler Corporation, Kokomo Transmission Plant was issued on September 1, 1999."

Furthermore, the Part 70 certification form, the emergency occurrence report form, the semi-annual boiler certification form, the quarterly report forms, and the quarterly deviation and compliance monitoring report all reference KTP as a source covered under this permit. DaimlerChrysler requests that all references to KTP be removed. As an example, requested changes to the certification form are shown below:

CERTIFICATION

Source Name: Daimler Chrysler Corporation, Kokomo Casting Plant
Source Address: Chrysler Kokomo Casting Plant
1001 East Boulevard, Kokomo, Indiana 46904
~~Source Address: Chrysler Kokomo Transmission Plant~~
~~2401 S. Reed Road, Kokomo, Indiana 46904~~
Mailing Address: 1001 East Boulevard, Kokomo, Indiana 46904
Part 70 Permit No.: 067-5246-00065

Response 5

The permit must document the determination that the two plants are considered to be a single major source. Since the definition of "major source" requires that the Kokomo Casting Plant and the Kokomo Transmission Plant be considered a single major source, it is appropriate to reference the transmission plant in this permit. Separate permits are being issued solely for administrative purposes. The applicable Part 70 rules still apply to the source as a whole (both plants combined). IDEM has clarified that the certification form applies only to those facilities located at the Castings Plant. The following changes have been made to the form.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **This certification applies only to the facilities located at the DaimlerChrysler Kokomo Castings Plant.**

Signature:

Printed Name:

Title/Position:

Phone:

Date:

Comment 6 Reverberatory Furnaces

DaimlerChrysler would like to clarify the description of the reverberatory furnaces as the capacity information presented in the draft Part 70 permit is unclear. The maximum capacity described on a tons/hour basis is one of several ways to measure the capacity of the furnaces. However, the most relevant operating information is the heat input capacity of the burners. The maximum rate of clean ingots/sows and molten metal throughput are not directly related to emissions. KCP receives metal in molten form for most of the furnaces and as indicated in the permit application, emissions from holding are not influenced by the charging of the furnaces with clean ingots/sows or molten aluminum, but rather primarily from natural gas combustion. The scrap remelt rate, however, does directly affect emissions, and therefore it is appropriate to indicate maximum remelt capacity, if specified in the construction permit (i.e., Permit No. 067-10006-00065 for 4RF). When capacities are specified, they should indicate whether they are molten metal throughput or scrap remelt.

For furnaces 7RF through 10RF, KCP previously anticipated remelting scrap aluminum generated onsite. However, the plant has recently determined that remelting of scrap aluminum in 7RF through 10RF will not be implemented.

DaimlerChrysler is requesting the maximum capacity descriptions for the reverberatory furnaces be revised as follows.

DaimlerChrysler is requesting the following revisions to A.3 and the descriptions in D.1:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1ARF, with remelt capability, constructed in 1988, with ~~a maximum capacity of 1 ton per hour~~ and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF,
- (b) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1BRF, with remelt capability, constructed in 1988, with ~~a maximum capacity of 1 ton per hour~~ and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (c) one (1) natural gas-fired aluminum reverberatory furnace, identified as 2RF, with remelt capability, constructed in 1984, with ~~a maximum capacity of 30 tons per hour~~ and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 2RF and 2RCW;

- (d) one (1) natural gas-fired aluminum reverberatory furnace, identified as 4RF, constructed in 1998, with a maximum remelt rate of 6.5 tons of scrap metal aluminum and granular flux per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 4RF and 4RCW;
- (e) one (1) natural gas-fired aluminum reverberatory furnace, identified as 5RF, with remelt capability, constructed in 1978, with a ~~maximum capacity of 20 tons per hour and a~~ maximum heat input capacity of 18 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 5RF and 5RCW;
- (f) one (1) natural gas-fired aluminum reverberatory furnace, identified as 6RF, with remelt capability, constructed in 1983, with a ~~maximum capacity of 30 tons per hour and a~~ maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks ~~56RF~~ and ~~65RCW~~;
- (g) one (1) natural gas-fired aluminum reverberatory furnace, identified as 7RF, with no remelt capability, constructed in 1995, with a ~~maximum capacity of 10 tons per hour and a~~ maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 7RF;
- (h) one (1) natural gas-fired aluminum reverberatory furnace, identified as 8RF, with no remelt capability, constructed in 1995, ~~with a maximum capacity of 10 tons per hour and a~~ maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 8RF;
- (i) one (1) natural gas-fired aluminum reverberatory furnace, identified as 9RF, with no remelt capability, constructed in 1998, with a ~~maximum capacity of 10 tons per hour and a~~ maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack ~~409RF~~;
- (j) one (1) natural gas-fired aluminum reverberatory furnace, identified as 10RF, with no remelt capability, constructed in 1998, with a ~~maximum capacity of 10 tons per hour and a~~ maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;

In Section A.4 (a) and D.1, DaimlerChrysler would like to clarify the description of the reverberatory furnace 3RF as suggested below:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 3RF, with remelt capability, constructed in 1997, with a ~~maximum capacity of 1.5 tons per hour and a~~ maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 3RF and ~~3RCW~~;"

Response 6

Since DaimlerChrysler has clarified that furnaces 7RF, 8RF, 9RF, and 10RF do not have remelt capability, the descriptions in Sections A.3 and D.1 have been changed to reflect this. Additionally, since the potential to emit (PTE) of the furnaces was directly based on remelt capability, the PTE calculations for these furnaces have been revised. As a result, the PTE of the 1995 modification and the 1997 modification are now each below the PSD significance levels so production limits are not necessary to render the requirements of PSD not applicable to the furnaces constructed during those years (3RF, 7RF, 8RF, 9RF, and 10RF). Condition D.1.1(a) has been changed as shown below:

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of PSD not applicable, the following conditions shall apply:

- (a) The furnaces shall comply with the PM, PM10, and production limits as shown in the table below.

Furnace Identification	PM limit (lbs/ton of metal)	PM10 limit (lbs/ton of metal)	Production limit (tons of metal per 12 consecutive month period)	Production Limit for First 12 months after issuance of this permit (tons of metal per month)
5RF	0.457	none	109,482	9,123.5
6RF	0.457	none	109,482	9,123.5
2RF	0.457	none	109,482	9,123.5
1ARF and 1BRF	2.35 (each)	none	68,046 (for both furnaces combined)	5,670.5 (for both furnaces combined)
7RF and 8RF	2.632 (each)	1.336 (each)	15,431 (For both furnaces combined)	1286 (For both furnaces combined)
9RF, 10RF and 3 RF	2.050 (each)	1.230 (each)	20,864 (For all three furnaces combined)	1730.3 (For all three furnaces combined)
4RF	0.720 0.875	0.720 0.527	22,149 not applicable	not applicable

- (b) The furnaces shall comply with the PM and PM10 limits shown in the following table.

Furnace Identification	PM limit (lbs/hr)	PM10 limit (lbs/hr)
9RF and 10RF	2.15 (each)	1.02 (each)
7RF and 8RF	2.32 (each)	1.18 (each)
3RF	1.19	1.19

- ~~(b)~~(c) The PM limit for furnace 4RF shall supersede the requirements of Condition D.9.1(b)(1) of Construction Permit CP067-10006-00065 issued December 7, 1998.

- ~~(c)~~(d) The PM10 limit for furnace 4RF shall supersede the requirements of Condition D.9.1(b)(2) of Construction Permit CP067-10006-00065 issued December 7, 1998.

- ~~(d)~~(e) The scrap metal rate of furnace 4RF shall not exceed 6.5 tons per hour.

- ~~(e)~~(f) Furnace 4RF shall melt only clean scrap generated on-site.
- (g) Upon construction and operation of the proposed furnace No. 4, Furnace D shall be permanently taken out of service.**
- ~~(f)~~(h) All of the furnaces shall combust only natural gas fuel.
- ~~(g)~~(i) The Permittee shall not melt any scrap from outside sources in any of their furnaces. Therefore, the source will not be classified as a secondary metal processing plant, one of the 28 listed source categories.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply to any of the furnaces.

Since the potential to emit of each of the furnaces is directly based on the maximum remelt capacity of the furnaces, IDEM prefers to list the remelt capacity of each furnace as part of the description of the unit. The descriptions of the emission units do not constitute enforceable conditions. The permit does now clarify that the capacities are "remelt" capacities and not "throughput" capacities. For example, A.3(a) has been changed as shown below. The changes to the stack IDs have been made in the descriptions in Sections A.2 and D.1 of the permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1ARF, constructed in 1988, with a maximum **remelt** capacity of 1 ton per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;

Comment 7 Shotblast Units - General

The descriptions of the shotblast machines regarding the capacity of the units should be revised. Emissions from shotblast operations are primarily associated with the rate of shot blast and not the quantity of parts processed. Also, the descriptive changes requested below are consistent with the underlying construction permit descriptions. The emission factor for shotblast machines is expressed as lb PM/lb shot blast rate. Further, Rule 326 IAC 6-3-2, the process weight rate rule (the total amount of aluminum parts processed + the shotblast rate) does not apply to Howard County. Therefore, it is appropriate only to identify the maximum shotblast rate for each unit as the maximum parts throughput does not affect emissions.

As discussed under General Comment 4, DaimlerChrysler is also requesting IDs for control devices be removed. Also, the shotblast units are controlled by cartridge filters, not baghouses.

The following changes should be made in Sections A.2 and D.3.

- (n) one (1) Pangborn shotblast machine, identified as DC1, constructed in 1968, with a maximum ~~capacity of 10,000 pounds of aluminum parts~~ **shotblast rate of 72 tons** per hour, with emissions controlled by a scrubber ~~DC2~~ and exhausting to stack DC1;
- (o) one (1) Mesh Belt shotblast machine, identified as DC2, constructed in 1998, with a maximum ~~capacity of 13,586 pounds of aluminum parts~~ **shotblast rate of 168,000 pounds** per hour, with emissions controlled by a cartridge filter ~~DC2~~ and exhausting to stack DC2;

- (p) one (1) Mesh Belt shotblast machine, identified as DC6, constructed in 1998, with a maximum ~~capacity of 13,586 pounds of aluminum parts~~ shotblast rate of 168,000 pounds per hour, with emissions controlled by a cartridge filter ~~DC62~~ and exhausting to stack DC6;
- (q) one (1) Rotoblast shotblast machine, identified as DC3, constructed in 1994, with a maximum ~~capacity of 6,000 pounds of aluminum parts~~ shotblast rate of 88,350 pounds per hour, with emissions controlled by cartridge filter ~~DC3~~ and exhausting to stack DC3;
- (r) one (1) Tumbleblast shotblast machine, identified as DC5, constructed in 2000, with a maximum ~~capacity of 4,000 pounds of aluminum parts~~ shotblast rate of 40,000 pounds per hour, with emissions controlled by cartridge filter ~~DC3~~ and exhausting to stack DC3;
- (s) one Wire Mesh machine used for deburring of parts, identified as DC4, constructed in 1999, with a maximum ~~capacity of 4,000 pounds of aluminum parts~~ shotblast rate of 174,760 pounds per hour, with emissions controlled by ~~baghouse~~ a cartridge filter DC4 and exhausting to stack DC4;

Response 7

IDEM agrees to list the capacities of the shotblast machines in terms of the amount of shot used instead of the amount of castings blasted. As explained in response to comment #4, the control device IDs have been deleted from the permit. The permit now correctly identifies the control device for the wire mesh machine as being a cartridge filter instead of a baghouse.

Comment 8 Section A.3 (t)

Maintenance painting is conducted as a routine maintenance activity that is not associated with any production activities and as such is specifically identified as a trivial activity pursuant to Rule 326 IAC 2-7-1(40)(E)(ii). Therefore, DaimlerChrysler is requesting that the maintenance paint booth be removed from this permit.

- (t) ~~one (1) paint booth, identified as MP1, constructed in 1988, with a maximum capacity of 0.386 gallons per hour, with emissions uncontrolled and exhausting to stack PV5.~~

Response 8

The maintenance painting operation has been removed from the permit, as requested.

- (t) ~~one (1) paint booth, identified as MP1, constructed in 1988, with a maximum capacity of 0.386 gallons per hour, with emissions uncontrolled and exhausting to stack PV5.~~

Comment 9 Section A.4 (b)

The die cast machines are individually insignificant units, and therefore, it is not necessary to identify the quantity of units. Therefore, DaimlerChrysler is requesting the quantities be removed from the description as suggested below:

- (b) ~~one hundred twenty nine (129) die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, 1997, and 2001, with a maximum capacity of 24.835 tons per hour, with emissions uncontrolled and exhausting internally;~~

Response 9

The following change has been made to condition A.4(b).

- (b) ~~one hundred twenty nine (129) die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, 1998, and 2001, with a maximum capacity of 24.835 tons per hour, with emissions uncontrolled and exhausting internally;~~

Comment 10 Section A.4 (c)

The trim machines are individually insignificant units, and therefore it is not necessary to identify the quantity of units. Therefore, DaimlerChrysler is requesting the quantities be removed from the description as suggested below:

- (c) ~~trim operations including seventy three (73) trim machines using a maximum of 0.33 gallons of lubricant spray per hour, with emissions uncontrolled and exhausting internally;~~

Response 10

The following change has been made to condition A.4(c).

- (c) ~~trim operations including seventy three (73) trim machines using a maximum of 0.33 gallons of lubricant spray per hour, with emissions uncontrolled and exhausting internally;~~

Comment 11 Section A.4 (d)

DaimlerChrysler is requesting that the tooling operations be removed as these operations are included in item (h) of Section A.4. Item (h) identifies grinding and machining operations operated with control devices as referenced in 326 IAC 2-7-1(21)(xxiii).

- (d) ~~tooling operations including twenty two (22) dry grinding/sanding/cutting stations and nine (9) wet grinding stations using a maximum of 0.09 gallons of cutting oil per hour, with emissions controlled by a baghouse and exhausting internally;~~

Response 11

The following change has been made to condition A.4(d). The remaining letters have been changed in this condition as needed. Also, the following change has been made to A.4(g) to include the specific types of tooling operations.

- (d) ~~tooling operations including twenty two (22) dry grinding/sanding/cutting stations and nine (9) wet grinding stations using a maximum of 0.09 gallons of cutting oil per hour, with emissions controlled by a baghouse and exhausting internally;~~
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations-, **tooling operations including dry grinding/sanding/cutting stations wet grinding stations using a maximum of 0.09 gallons of cutting oil per hour, with emissions controlled by a baghouse and exhausting internally.**

Comment 12 Section A.5 (b)

This condition is applicable because KCP is a major Title V source and DaimlerChrysler would like to clarify this condition as suggested below:

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability) because the facility is a major Title V source.

Response 12

The requested change has been made.

Comment 13 Condition C.13 (a)

KCP has pressure drop gauges installed by the manufacturer of the unit or associated control device where the reading in practice may be less than 20% of full scale. KCP is requesting that IDEM not require replacement of original factory equipment. Therefore DaimlerChrysler is requesting the following revision:

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading. If the gauge is original factory equipment, then the requirement that the expected reading be no less than 20% of full scale does not apply.

Response 13

IDEM must require a minimum standard for pressure gauges because, in order to accurately measure the pressure drop, adequate pressure drop gauges must be used. However, paragraph (c) of the same condition provides that the Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters. If DaimlerChrysler wishes to apply for approval to use the pressure gauges currently in use at the facility, then detailed information about the pressure gauges (such as the full scale as compared to the expected normal readings) should be submitted to IDEM, OAQ, Compliance Branch, with full justification for why approval should be granted. No change has been made to the condition.

Comment 14 Condition C.14 (Emergency Reduction Plans)

DaimlerChrysler has submitted an Emergency Reduction Plan on June 19, 1998 and is currently preparing an update for submittal. Therefore, the requirements of condition C.14 (Emergency Reduction Plans) have been met.

Response 14

Condition C.13, Emergency Reduction Plans, has been changed as shown below:

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee ~~shall~~ prepared **and submitted** written emergency reduction plans (ERPs) consistent with safe operating procedures **on June 19, 1998**.
- (b) ~~These ERPs shall be submitted for approval to:~~

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ninety (90) days after the date of issuance of this permit.~~

The ERP ~~does~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) ~~If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- (d) ~~These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- (e) ~~Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- (f)(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Comment 15 Condition D.1.1(d)

DaimlerChrysler would like to clarify this condition to match the requirements of condition D.9.1(b)(4) of Amendment Number 067-11990-00065 as suggested below:

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of PSD not applicable, the following conditions shall apply:

- (d) The ~~melt rate~~ scrap remelt rate of furnace 4RF shall not exceed 6.5 tons per hour."

Response 15

IDEM agrees. The requested change has been made.

Comment 16 Condition D.1.5

DaimlerChrysler believes the number of tests required for the reverbatory furnaces is excessive and overly burdensome as the furnaces operate similar to one another and emissions do not vary significantly between furnaces on a per unit basis (e.g., remelt emissions are determined as lb/ton scrap remelted, independent of which furnace remelt occurs in). Further, DaimlerChrysler is requesting an

extension of the timeframe for conducting the required tests in order to allow for scheduling flexibility, cost reduction, and to assure that the testing can be completed within the required schedule. It is DaimlerChrysler's understanding that IDEM typically allows 36 months for testing to be conducted. Therefore, DaimlerChrysler is requesting the following revisions:

Furnace Identification	Stack Tests Required	Time frame for stack testing
4RF	PM and PM10	Between May 2004 and By November 2004
2RF	PM and PM10	Within 12 months after permit issuance
5RF	PM and PM10	Within 12 months after permit issuance
6RF	PM and PM10	Within 12 months after permit issuance
One of the following: either 1ARF or 1BRF, 2RF, 5RF, or 6RF	PM and PM10	Within 12 36 months after permit issuance
either furnace 7RF or 8RF	PM and PM10	Within 12 months after permit issuance
One of the following: either furnace 7RF, 8RF, 9RF or 10RF	PM and PM10	Within 12 months after permit issuance

Response 16

IDEM agrees to change the time frame for testing furnace 4RF to allow a wider window for completing the testing. However, the revised language clarifies that the source cannot use the stack test results for furnace 4RF from the test completed in 1999 to fulfill the requirement to test during the first Part 70 permit cycle. Since DaimlerChrysler has clarified in comment #6, that furnaces 7RF, 8RF, 9RF, and 10RF do not have remelt capability, IDEM has deleted the requirement to test any of these furnaces. IDEM agrees to spread out the test requirements so that all of the tests are not required within the first 12 month period after permit issuance. However, IDEM does not agree to just assume that emissions from furnaces 1ARF, 1BRF, 2RF, 5RF, and 6RF do not vary significantly, since these furnaces have wide-ranging capacities and stack testing has never been performed on any of these furnaces. The Permittee will be required to certify compliance with the emission limits in the permit. Without stack testing results on a significant number of these furnaces, the Permittee cannot know for certain that emissions from these furnaces do not vary significantly from one another. Furnaces 1ARF and 1BRF are identical, therefore the Permittee may test only one of those two furnaces. Additionally, furnaces 2RF and 6RF are described as being identical; therefore, the condition has been changed to allow the Permittee to test only one of those two furnaces as well. Furnace 5RF is unlike any of the other furnaces required to be tested because it has a different remelt capacity; therefore the permit requires a stack test for furnace 5RF. The revised permit condition is shown below.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform stack testing as shown in the table below using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.1.1,

D.1.2, and D.1.3. PM10 includes filterable and condensable PM10. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Furnace Identification	Stack Tests Required	Time frame for stack testing
4RF	PM and PM10	Between May 2004 the date of issuance of this permit and November 2004
either 2RF or 6RF	PM and PM10	Within 12 months after permit issuance
5RF	PM and PM10	Within 12 24 months after permit issuance
6RF	PM and PM10	Within 12 months after permit issuance
either 1ARF or 1BRF	PM and PM10	Within 12 36 months after permit issuance
either furnace 7RF or 8RF	PM and PM10	Within 12 months after permit issuance
either furnace 9RF or 10RF	PM and PM10	Within 12 months after permit issuance

Comment 17 Conditions D.1.7 and D.1.8

CP 067-10006-00065 only requires records of the amount of scrap remelted to be maintained for 4RF. KCP is not required to maintain such records for any other furnace. DaimlerChrysler is also requesting that the requirement be clarified to require monthly record keeping. Therefore, DaimlerChrysler is requesting the following revision to Condition D.1.7(b):

D.1.7 Record Keeping Requirements

- (b) To document compliance with Condition D.1.1, the Permittee shall maintain records of the scrap metal melted throughput rate in Furnace 4RF on a monthly basis ~~each of the furnaces.~~

DaimlerChrysler is requesting that reporting be completed annually versus quarterly as there does not appear to be any basis for requiring quarterly submittals (Condition D.1.7 requires only that monthly records to be maintained). The information that should be submitted includes the scrap remelt in Furnace 4RF. Therefore, DaimlerChrysler is requesting the following revisions:

D.1.8 Reporting Requirements

~~A quarterly~~ An annual summary of the ~~information scrap remelt in furnace 4RF~~ to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the ~~quarter~~ year being reported. The

reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Additionally, there are two quarterly report forms for the reverberatory furnaces. The second quarterly report requires the same information as column 2 of the first report and is redundant. Therefore KCP should not be required to submit the second form.

Response 17

Furnaces 1ARF, 1BRF, 2RF, 5RF, and 6RF must all comply with production limits, in addition to pound per ton emission limits, in order to render the requirements of PSD not applicable. Previous permits for furnaces 1ARF, 1BRF, 2RF, 5RF, and 6RF did not include the necessary limits to render PSD not applicable; therefore, those limits are being included in the Part 70 permit now as additional requirements. In order to show compliance with the production limits, the Permittee is required to submit a quarterly report of the actual amount of scrap remelted in each of the furnaces. IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). IDEM believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance.

The IDEM agrees to delete the second quarterly report form.

Comment 18 Condition D.3.4

DaimlerChrysler believes the testing requirements for the shotblast machines are excessive. The units operate similar to each other and it is appropriate to apply the test results of one unit to the other units. The cartridge filters are the same for the units and provide the same level of control. The shotblast machines operate in a steady state manner similar to each other and utilize the same type of shotblast media. Therefore, DaimlerChrysler is requesting that testing be required for the wet scrubber controlling unit DC1 and one of the cartridge filter units associated with unit DC2, DC3, DC4, DC5 or DC6.

In addition, separate testing for PM is unnecessary if KCP can demonstrate compliance with the PM10 limit. Further, for this type of dry dust operation, testing for filterable PM10 is appropriate, however testing for condensible PM is not. Therefore, DaimlerChrysler is requesting the following revisions:

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform PM stack testing within 36 months after permit issuance. The permittee shall perform testing on the wet scrubber controlling DC1 and one of the cartridge filter units associated with one of the shotblast DC2, DC3, DC4, DC5, or DC6. as shown in the table below. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.3.1 and D.3.2 PM10 from shotblasting includes filterable ~~and condensible~~ PM10. These tests shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing."

Shotblast Machine Identification	Stack Tests Required	Time frame for stack testing
wet scrubber DC1 controlling the DC1 Pangborn shotblast machine	PM	Within 24 months after permit issuance, then once every 5 years
cartridge filter DC2 controlling the 2 mesh belt shotblast machines DC2 and DC6	PM and PM10	Between October 2003 and March 2004, then once every 5 years
cartridge filter DC3A controlling the DC3 Rotoblast shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
cartridge filter DC3B controlling the DC5 Tumbleblast shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
baghouse DC4 controlling the wire mesh shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years

Response 18

IDEM agrees that it is not necessary to test all of the shotblast machines. Since the two mesh belt shotblast machines DC2 and DC6 demonstrated compliance during a test conducted on March 23, 1999, the permit will not require further testing for these units. Testing will be required for the Pangborn machine which is controlled by a scrubber. Of the remaining units, IDEM has chosen to require a test for the unit with the largest capacity, namely the wire mesh machine identified as DC4. IDEM agrees to extend the time frame for initial testing to within 36 months after the issuance of this permit.

The EPA's definition of PM10 includes both filterable and condensible. The Permittee may contact the IDEM Compliance Data Section to request adjusting the protocol prior to the testing. At that time the Compliance Data Section will either approve or disapprove the request. Therefore, the IDEM will not delete the testing requirement for Condensible PM10 from the permit.

Revised condition D.3.4 is shown below.

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform stack testing as shown in the table below. Testing shall be conducted using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.3.1 and D.3.2. PM10 includes filterable and condensible PM10. These tests shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

Shotblast Machine Identification	Stack Tests Required	Time frame for stack testing
wet scrubber DC1 controlling the DC1 Pangborn shotblast machine	PM	Within 24 36 months after permit issuance, then once every 5 years
cartridge filter DC2 controlling the 2 mesh belt shotblast machines DC2 and DC6	PM and PM10	Between October 2003 and March 2004, then once every 5 years
cartridge filter DC3A controlling the DC3 Rotoblast shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
cartridge filter DC3B controlling the DC5 Tumbleblast shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
baghouse DC4 cartridge filter controlling the wire mesh shotblast machine	PM and PM10	Within 24 36 months after permit issuance, then once every 5 years

Comment 19 Condition D.3.9(b)

DaimlerChrysler believes that since Condition D.3.9 (a) requires the unit to be shutdown immediately until the failed unit has been repaired, replaced, or redirected to an alternate control device, the 8 hour timeframe referenced in D.3.9 (b) and D.3.12(a) is unnecessary and is requesting this condition be removed. If IDEM elects to allow KCP to continue operation of the process with a malfunctioning control device, then the requirement to respond within 8 hours is reasonable.

D.3.9 Scrubber Failure

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion if the control device remains in operation. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee

satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion if the control device remains in operation. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Response 19

For clarification purposes, Condition D.3.9 has been revised as shown below, to include the emergency provisions.

D.3.9 Scrubber Failure

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Response steps may include shutting down the emission unit and corresponding control device, or redirecting emissions to another control device temporarily until the failed control device is repaired or replaced. Therefore it is not necessary to revise the conditions to state that response steps are not required unless the control device remains in operation.

Comment 20 Condition D.3.11

The emissions from the shotblast units are not controlled by baghouses, but rather cartridge filters. Further, the reference to the core room is incorrect as this process does not exist at KCP. Therefore, DaimlerChrysler is requesting the following revisions:

D.3.11 Dry Control Device (e.g. Baghouse and Cartridge Filter) Inspections

- (a) An inspection shall be performed each calendar quarter of all bags or cartridge filters controlling the shotblasting emissions. ~~A baghouse~~ An inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. Documentation of this inspection may be included as part of the Preventive Maintenance Plan. ~~All defective bags shall be replaced.~~
- (b) ~~An inspection shall be performed each calendar quarter of the cartridge filter controlling the core room sand handling process when venting to the atmosphere.~~

Response 20

The permit now reflects the change from a baghouse to a cartridge filter for control of shotblast machine DC4. Condition D.3.11 has been revised to require cartridge filter inspections. Since the source does not use any baghouses, all references to baghouses have been deleted from the permit. IDEM requires the Permittee to keep a separate records of cartridge filter inspections. Additionally, the condition will specify that defective cartridges shall be replaced. The revised condition is shown below.

D.3.11 ~~Baghouse and~~ Cartridge Filter Inspections

- (a) ~~An inspection shall be performed each calendar quarter of all bags cartridge filters~~ controlling the shotblasting emissions. ~~A baghouse~~ An inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective ~~bags cartridges~~ shall be replaced.
- (b) ~~An inspection shall be performed each calendar quarter of the cartridge filter controlling the core room sand handling process when venting to the atmosphere.~~

Comment 21 TSD

DaimlerChrysler has not made specific comments on the TSD, however, the comments relating to the permit also apply to the relevant sections of the TSD. As discussed above under general comment 2, the PSD evaluation included in the TSD is not appropriate.

Response 21

IDEM prefers to have the TSD document the reasoning for the public noticed version of the permit. This addendum to the TSD explains any changes to the permit after public notice. This method provides documentation for each step in the permit process. As a result, IDEM does not make changes to the TSD after public notice.

Upon further review, IDEM has decided to make the following revisions to the permit:

Revision #1

The following change has been made to condition A.1, General Information. This change has been made to avoid future amendments to this permit.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

Responsible Official: ~~James E. Reed, Jr.~~ **Plant Manager**

Revision #2

The new rule cite has been added to Condition B.2 (Permit Term). Also, in order to avoid confusion for renewals as to what "original" date we are referring to the following change has been made:

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Revision #3

Since B.7(c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~
- (c) **For information furnished by the Permittee to IDEM, OAQ,** the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Revision #4

Condition B.11 Preventive Maintenance Plan has been revised because it is not necessary to state twice that the PMP does not need to be certified. Since it is more appropriate to state in (c), it has been removed from (a).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The ~~PMP and the~~ PMP extension notification **does** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Revision #5

Condition B.12 (Emergency Provisions) (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only. Also, the requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.15 to B.12. B.12(e) Emergency Provisions has been revised to correct the rule cite as follows.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation; ~~except as provided in 326 IAC 2-7-16:~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
 - (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
 - (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~
- ~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
- (h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

Revision #6

Condition B.13(h) Permit Shield has been revised to correct the rule cite as shown below. Also, Paragraph (b) was removed from Condition B.13 (Permit Shield). Since Condition B.14 (Prior Permits Superseded) has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (b) ~~This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(78)]

Revision #7

Condition B.14 (Multiple Exceedances) has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed since it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

Revision #8

Condition B.14 (Prior Permits Superseded) was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
 - (1) incorporated as originally stated,**
 - (2) revised, or**
 - (3) deleted****by this permit.**
- (b) **All previous registrations and permits are superseded by this permit.**

Revision #9

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations. Paragraph (c) has been removed. The language that was previously in (c) of Condition B.15 has been revised and incorporated into Condition B.12 (Emergency Provisions).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- ~~(c) — Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

Revision #10

Condition B.20 has been updated in order to be consistent with 326 IAC 2-7-20(a)(4). The rule cite in B.20(a)(5) has been revised as shown below.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(**1**), (c)(1), and (e)(2).

Revision #11

Condition B.21 was revised as shown below.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed **by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.**

Revision #12

Rule 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to B.24. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] **[326 IAC 2-1.1-7]**

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **I/M & Billing Section**), to determine the appropriate permit fee.

Revision #13

Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.7 (Asbestos Abatement Projects) to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Revision #14

The following was added to condition C.9 Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements:

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Revision #15

The IDEM, OAQ has deleted condition C.11, Maintenance of Emission Monitoring Equipment. This change was made because the Permittee does not have either a continuous emission monitor or a continuous opacity monitor. Therefore, the condition is not necessary. The rest of the conditions in the C Section have been renumbered accordingly.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- ~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the~~

~~parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.~~

- (b) ~~The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

Revision #16

The following change has been made to Condition C.13, formerly Condition C.14, Emergency Reduction Plans (ERP). This change was made to reflect that the ERP has already been approved by IDEM, OAQ.

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 19, 1998.
- (b) ~~If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- ~~(c)~~(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

Revision #17

The IDEM, OAQ has restructured C.15 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or record keeping requirements may now be approved as minor permit modifications.

C.15 Compliance Monitoring ~~Response Plan - Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~(1) This condition;~~
 - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
 - ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
 - ~~(5) A~~ **a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee**, and maintained on site, and is comprised of:**
 - ~~(A)~~ **(1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and **an expected time frame for taking reasonable response steps.****
 - ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking** ~~not required to take any~~ further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a permit modification** to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ **(e)** Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **(f)** **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- (f)** ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Revision #18

Condition C.16, Actions Related to Noncompliance Demonstrated by a Stack Test, has been changed to require documents submitted to be certified by the responsible official.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do **not** require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Revision #19

The following condition has been added to Section D.2 of the permit. The rest of the conditions in the section and table of contents have been updated as appropriate.

D.2.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

Revision #20

Condition D.3.7, Scrubber Parametric Monitoring, has been updated as shown below. The conditions requiring parametric monitoring have been revised to clarify that an out of range pressure drop reading is not a deviation from the permit. The IDEM, OAQ has restructured the C Section, Compliance Response Plan - Preparation, Implementation, Records and Reports condition to clarify the contents and implementation of the compliance response plan.

D.3.7 Scrubber Parametric Monitoring

The Permittee shall monitor and record the pressure drop of the scrubber, at least once per shift. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~
When for any one reading, the pressure drop across the control device shall be maintained within is outside the normal range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The ,the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of

this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Revision #21

Condition D.3.10, Baghouse and Cartridge Filter Parametric Monitoring, has been updated as shown below. The conditions requiring parametric monitoring have been revised to clarify that an out of range pressure drop reading is not a deviation from the permit.

D.3.10 Cartridge Filter Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse DC4 and cartridge filters DC2, DC3A, and DC3B controlling the shotblast machines, at least once per shift when the shotblasting process is in operation. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within~~ **When for any one reading, the pressure drop across the control device is outside the normal range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.** ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit.~~ Failure to take response steps in accordance with Section C - Compliance Monitoring **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records and Reports** shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Revision #22

The first box on the Emergency Occurrence Report form was revised to include the word "working" in order to be consistent with 326 IAC 2-7-16(b)(5) and the Emergency Provision.

This form consists of 2 pages

Page 1 of 2

- | | |
|---|---|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12) |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| C | The Permittee must submit notice by mail or facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

Revision #23

The first sentence of the Quarterly Deviation and Compliance Monitoring Report is being removed,

because it posed a conflict with the provisions that require an annual certification. IDEM does not intend to have this quarterly report represent a compliance certification.

Quarterly Deviation and Compliance Monitoring Report

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Revision #24

IDEM has removed the requirement to submit the natural gas boiler certification form. Since the boilers at this plant are not capable of combusting any fuel except natural gas, IDEM does not need to require the form to be submitted.

Reporting Requirements ~~[326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.2.5 Natural Gas Boiler Certification~~

~~A natural gas boiler certification form for each boiler shall be submitted semi-annually.~~

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Daimler Chrysler Corporation Kokomo Casting Plant
Source Address:	Chrysler Kokomo Casting Plant 1001 East Boulevard, Kokomo, Indiana 46904
Source Address:	Chrysler Kokomo Transmission Plant 2401 S. Reed Road, Kokomo, Indiana 46904
County:	Howard
SIC Code:	3363
Operation Permit No.:	T067-5246-00065
Permit Reviewer:	Nisha Sizemore

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Daimler Chrysler Corporation relating to the operation of an aluminum die cast facility, including melt furnaces, machinery, cleaning and heat treating equipment to produce transmissions for use in automobiles and light-duty trucks.

Source Definition

The source consists of two (2) plants:

The Chrysler Kokomo Transmission Plant and Chrysler Kokomo Casting Plant have been considered on single major source as defined by 326 IAC 2-7-1(22). The Chrysler Kokomo Transmissions Plant was issued a separate Title V permit under the Part 70 No. T067-6504-00065 on September 1, 1999.

- (1) The Kokomo Transmission Plant (KTP) is located at 2401 S. Reed Road, Kokomo, IN 46904; and
- (2) The Kokomo Casting Plant (KCP) is located at 1001 East Boulevard, Kokomo, IN 46904.

The following explains why KTP and KCP are combined sources:

The OAQ shall consider KTP and KCP as one single major source because plants KTP and KCP are under common control, KCP is acting as a support facility for KTP, and the plants are located on contiguous properties.

The Indiana Transmission Plant (ITP) will be considered a separate source because it is approximately six (6) miles from KCP and KTP. Furthermore, approximately 0.1 percent and 23 percent of supplies from KTP and KCP, respectively, are sent to Indiana Transmissions Plant.

Separate Part 70 permits will be issued to Chrysler Corporation, Kokomo Transmission Plant and Chrysler Corporation, Kokomo Casting Plant.

Process Description

Chrysler Corporation, Kokomo Casting Plant (KCP) receives most of its aluminum for casting operations in the molten form. The molten aluminum is delivered in trucks and is transferred to the furnaces. Some aluminum is received in solid form as sows and ingots and is melted on site. The molten aluminum is delivered to the individual casting machines. Molten aluminum is loaded into the casting machine reservoir, a ladle picks up the correct amount of aluminum for the casting and charges the machine. A plunger pushes the aluminum into the die, and rough cast parts are produced. The rough parts are trimmed in the trim machines. The excess scrap and recycle metal is remelted on-site or sent off-site for remelting. The parts are then cleaned and deburred in the various shotblast machines. Any part that does not meet specification during any of the steps of production, is added to the scrap metal for on-site or off-site remelting.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1ARF, constructed in 1988, with a maximum capacity of 1 ton per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (b) one (1) natural gas-fired aluminum reverberatory furnace, identified as 1BRF, constructed in 1988, with a maximum capacity of 1 ton per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1RF;
- (c) one (1) natural gas-fired aluminum reverberatory furnace, identified as 2RF, constructed in 1984, with a maximum capacity of 30 tons per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 2RF and 2RCW;
- (d) one (1) natural gas-fired aluminum reverberatory furnace, identified as 4RF, constructed in 1998, with a maximum melt rate of 6.5 tons of aluminum and granular flux per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 4RF and 4RCW;
- (e) one (1) natural gas-fired aluminum reverberatory furnace, identified as 5RF, constructed in 1978, with a maximum capacity of 20 tons per hour and a maximum heat input capacity of 18 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 5RF and 5RCW;
- (f) one (1) natural gas-fired aluminum reverberatory furnace, identified as 6RF, constructed in 1983, with a maximum capacity of 30 tons per hour and a maximum heat input capacity of 20 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 5RF and 6RCW;
- (g) one (1) natural gas-fired aluminum reverberatory furnace, identified as 7RF, constructed in 1995, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 7RF;
- (h) one (1) natural gas-fired aluminum reverberatory furnace, identified as 8RF, constructed in 1995, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 8RF;

- (i) one (1) natural gas-fired aluminum reverberatory furnace, identified as 9RF, constructed in 1997, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (j) one (1) natural gas-fired aluminum reverberatory furnace, identified as 10RF, constructed in 1997, with a maximum capacity of 10 tons per hour and a maximum heat input capacity of 10 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 10RF;
- (k) one (1) natural gas-fired boiler, identified as 1BLR, constructed in 1964, with a maximum heat input capacity of 95 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 1SB;
- (l) one (1) natural gas-fired boiler, identified as 2BLR, constructed in 1964, with a maximum heat input capacity of 81.26 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 2SB;
- (m) one (1) natural gas-fired boiler, identified as 3BLR, constructed in 2000, with a maximum heat input capacity of 77.9 million British thermal units per hour, with emissions uncontrolled and exhausting to stack 3SB;
- (n) one (1) Pangborn shotblast machine, identified as DC1, constructed in 1968, with a maximum capacity of 10,000 pounds of aluminum parts per hour, with emissions controlled by scrubber DC2 and exhausting to stack DC1;
- (o) one (1) Mesh Belt shotblast machine, identified as DC2, constructed in 1998, with a maximum capacity of 13,586 pounds of aluminum parts per hour, with emissions controlled by a cartridge filter DC2 and exhausting to stack DC2;
- (p) one (1) Mesh Belt shotblast machine, identified as DC6, constructed in 1998, with a maximum capacity of 13,586 pounds of aluminum parts per hour, with emissions controlled by a cartridge filter DC2 and exhausting to stack DC2;
- (q) one (1) Rotoblast shotblast machine, identified as DC3, constructed in 1994, with a maximum capacity of 6,000 pounds of aluminum parts per hour, with emissions controlled by cartridge filter DC3A and exhausting to stack DC3;
- (r) one (1) Tumbleblast shotblast machine, also identified as DC5, constructed in 2000, with a maximum capacity of 4,000 pounds of aluminum parts per hour, with emissions controlled by cartridge filter DC3B and exhausting to stack DC3;
- (s) one Wire Mesh machine used for deburring of parts, identified as DC4, constructed in 1999, with a maximum capacity of 4,000 pounds of aluminum parts per hour, with emissions controlled by baghouse DC4 and exhausting to stack DC4;
- (t) one (1) paint booth, identified as MP1, constructed in 1988, with a maximum capacity of 0.386 gallons per hour, with emissions uncontrolled and exhausting to stack PV5.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment

There are no new facilities to be reviewed.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas-fired aluminum reverberatory furnace, identified as 3RF, constructed in 1997, with a maximum capacity of 1.5 tons per hour and a maximum heat input capacity of 8 million British thermal units per hour, with emissions uncontrolled and exhausting to stacks 3RF and 3RCW;
- (b) one hundred twenty nine (129) die casting machines, identified as DCAST1, constructed in 1960, 1983, 1995, 1997, and 2001, with a maximum capacity of 24.835 tons per hour, with emissions uncontrolled and exhausting internally;
- (c) trim operations including seventy-three (73) trim machines using a maximum of 0.33 gallons of lubricant spray per hour, with emissions uncontrolled and exhausting internally;
- (d) tooling operations including twenty-two (22) dry grinding/sanding/cutting stations and nine (9) wet grinding stations using a maximum of 0.09 gallons of cutting oil per hour, with emissions controlled by a baghouse and exhausting internally;
- (e) waste water treatment plant operations, with a maximum treatment capacity of 150,000 gallons per day, with emissions uncontrolled;
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
- (g) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour;
- (h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (j) Refractory storage not requiring air pollution control equipment;
- (k) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (l) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (m) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (n) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (o) Closed loop heating and cooling systems;

- (p) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (q) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (r) Noncontact cooling tower systems with natural draft cooling towers not regulated under a NESHAP;
- (s) Noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP;
- (t) Quenching operations used with heat treating processes;
- (u) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (v) Heat exchanger cleaning and repair;
- (w) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal;
- (x) Paved and unpaved roads and parking lots with public access;
- (y) Asbestos abatement projects regulated by 326 IAC 14-10;
- (z) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (aa) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (bb) Diesel emergency generators not exceeding 1600 horsepower;
- (cc) Stationary fire pumps;
- (dd) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations; and
- (ee) a laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The Kokomo Transmission Plant (KTP) has been operating under previous approvals including, but not limited to, the following:

- (a) CP 067-6375-00003, issued on November 12, 1996,
- (b) CP 067-4933-00003, issued on December 19, 1995,
- (c) OP 34-10-94-0290, issued on January 2, 1990,
- (d) OP 34-10-94-0291, issued on January 2, 1990,
- (e) OP 34-10-94-0292, issued on January 2, 1990,
- (f) OP 34-10-94-0293, issued on January 2, 1990,

- (g) OP 34-10-94-0294, issued on January 2, 1990,
- (h) Registration, number not provided, issued on January 19, 1988,*
- (i) Amendment to Operation Permit, issued on May 20, 1985,
- (j) Exemption, number not provided, issued on June 10, 1985,
- (k) Amendment to Exemption, issued on November 25, 1985,
- (l) Registration, number not provided, issued on April 16, 1984,
- (m) Amendment to Operation Permit, issued on May 1, 1984,
- (n) OP 34-10-86-0257, issued on November 29, 1982,
- (o) CP (34) 1437, issued on August 20, 1979,
- (p) CP (34) 1367, issued on March 1, 1979,
- (q) OP 34-10-82-0209, issued on October 17, 1978,
- (r) 067-10480, issued March 8, 1999,
- (s) 067-10711, issued July 23, 1999,
- (t) 067-10730, issued April 28, 1999,
- (u) 067-11399, issued November 9, 1999,
- (v) T067-6504, issued September 1, 1999,
- (w) Administrative Amendment 067-11981 issued April 27, 2000,
- (x) Significant Source Modification 067-12243, issued January 4, 2001,
- (y) Review Request 067-12526-00065, issued on August 15, 2000;
- (z) Interim Significant Source Modification 067-12243I-00065, issued on June 6, 2000;
- (aa) Significant Source Modification 067-12243-00065, issued on January 4, 2001

* OAQ received a letter from Chrysler on January 9, 1998 requesting to void the registration permit dated January 19, 1988 because the operating units, and the baghouse have been removed from the operations, and have been disposed of off-site.

None of the permits mentioned above were PSD permits.

The Kokomo Casting Plant (KCP) has been operating under previous approvals including, but not limited to, the following:

- (a) OP 34-06-87-0066, issued in 1983;
- (b) OP 067-0002-0295, issued in 1990;
- (c) OP 067-0002-0296, issued in 1990;
- (d) CP067-3883, issued November 23, 1994;
- (e) Registration 067-4453, issued April 21, 1995;
- (f) Registration 067-8256, issued June 5, 1997;
- (g) Registration 067-9188, issued December 22, 1997;
- (h) CP 067-10006, issued December 7, 1998;
- (i) Significant Source Modification 067-10648, issued June 18, 1999;
- (j) Minor Source Modification 067-11163, issued September 30, 1999;
- (k) Minor Source Modification 067-11508, issued December 8, 1999 and revoked by 067-12526 on August 15, 2000;
- (l) Administrative Amendment 067-11981 issued April 27, 2000;
- (m) Amendment 067-11990, issued September 1, 2000;
- (n) Significant Source Modification 067-12243, issued January 4, 2001;
- (o) Interim Significant Source Modification 067-12243I-00065, issued on June 6, 2000;
- (p) Significant Source Modification 067-12243-00065, issued on January 4, 2001;
- (q) Administrative Amendment 067-13661-00065, issued on March 26, 2001;
- (r) Interim Minor Source Modification 067-14232I-00065, issued on May 1, 2001; and
- (s) Minor Source Modification 067-14232-00065, issued on May 31, 2001.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) 067-11163, issued September 30, 1999

Condition D.1.1 states that the boiler BLR3 is limited to 0.25 pounds per million Btu pursuant to 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating).

(b) 067-11508, issued December 8, 1999

Condition D.1.2 states that the portable boiler is limited to 0.24 pounds per million Btu pursuant to 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating).

Reason not incorporated: These boilers are located at a source in Howard County which has the potential to emit PM greater than 100 tons per year. Howard County is a listed source in 326 IAC 6-1-7; therefore these boilers are subject to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations). Boilers subject to 326 IAC 6-1-2 are not subject to 326 IAC 6-2-4.

(c) CP067-8256, issued June 5, 1997

Condition 3. Pursuant to 326 IAC 6-3-2 (Process Operations), PM emissions from each of the two shotblast machines shall be limited to 2.7 pounds per hour.

Reason not incorporated: These shotblast machines are located at a source in Howard County which has the potential to emit PM greater than 100 tons per year. Howard County is a listed source in 326 IAC 6-1-7; therefore, these shotblast machines are subject to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations). Facilities subject to 326 IAC 6-1-2 are not subject to 326 IAC 6-2-3.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on January 18, 1996. Additional information was received on February 17, 2000, August 1, 2000, and August 31, 2000.

A notice of completeness letter was mailed to the source on March 3, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a

stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit from KCP (tons/year)	Potential To Emit from KTP (tons/year)	Total Potential to Emit (tons/year)
PM	greater than 250	greater than 250	greater than 250
PM-10	greater than 250	greater than 250	greater than 250
SO ₂	less than 100	greater than 250	greater than 250
VOC	less than 100	greater than 250	greater than 250
CO	greater than 100, less than 250	greater than 250	greater than 250
NO _x	greater than 100, less than 250	greater than 250	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit from KCP (tons/year)	Potential To Emit from KTP (tons/year)	Total Potential to Emit (tons/year)
hydrogen fluoride	less than 10		less than 10
manganese	less than 10	less than 10	greater than 10
nickel	less than 10		less than 10
lead	less than 10	less than 10	less than 10
ethylene glycol	less than 10	greater than 10	greater than 10
acrylonitrile	less than 10		less than 10
styrene	less than 10		less than 10
HCl		greater than 10	greater than 10
ammonia		less than 10	less than 10
benzene		greater than 10	greater than 10
MTBE		less than 10	less than 10
arsenic		less than 10	less than 10
cadmium		less than 10	less than 10
POM		less than 10	less than 10
formaldehyde		less than 10	less than 10
xylene		less than 10	less than 10
toluene		less than 10	less than 10
ethyl benzene		less than 10	less than 10
chromium compounds		less than 10	less than 10
methyl methacrylate	less than 10		less than 10
TOTAL	less than 25	greater than 25	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, NOx, SO₂, VOC, and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAQ emission data.

Pollutant	Actual Emissions KTP (tons/year)	Actual Emissions KCP (tons/year)
PM	154.7	76.8
PM-10	72.9	64.1
SO ₂	574.9	1.5
VOC	57.9	50.6
CO	165.9	0.001
NO _x	221.8	43.6
ammonia	0.000001	0.0
glycol ethers	4.1	4.568
benzene	0.2	0.0
ethyl benzene	0.008	0.001
toluene	0.05	0.003
xylene	0.1	0.135
lead	0.02	0.0
MTBE	0.02	0.0
arsenic	0.02	0.0
cadmium	0.001	0.0
chromium compounds	0.1	0.00030
formaldehyde	0.2	0.109
manganese	1.3	0.0006
POM	0.002	0.0
diethanolamine	0.0	0.187
Co compounds	0.0	0.010
nickel compounds	0.0	0.0004

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units located at Kokomo Casting Plant.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
furnace 1ARF	10.285	10.285	0.021	0.19	2.94	3.50	0.089
furnace 1BRF	10.285	10.285	0.021	0.19	2.94	3.50	0.089
furnace 2RF	24.999	24.999	0.053	0.48	7.36	8.76	0.148
furnace 4RF	7.969	7.969	0.053	0.48	7.36	8.76	0.188
furnace 5RF	24.999	24.999	0.047	0.43	6.62	7.88	0.126
furnace 6RF	24.999	24.999	0.053	0.48	7.36	8.76	0.148
furnace 7RF	10.155	5.155	0.026	0.24	3.68	4.38	0.152
furnace 8RF	10.155	5.155	0.026	0.24	3.68	4.38	0.152
furnace 9RF	8.907	5.344	0.026	0.24	3.68	4.38	0.152
furnace 10RF	8.907	5.344	0.026	0.24	3.68	4.38	0.152
DC1 Pangborn controlled by scrubber DC1	7.8	7.8	0.00	0.00	0.00	0.00	0.00
DC2 and DC6 Mesh Belt shotblasts	11.00	1.00	0.00	0.00	0.00	0.00	0.00
DC3 Rotoblast controlled by cartridge filter DC3	19.639	9.639	0.00	0.00	0.00	0.00	0.00
DC5 Tumbleblast controlled by cartridge filter DC3	20.329	10.329	0.00	0.00	0.00	0.00	0.00
DC4 Wire mesh shotblast controlled by baghouse DC4	23.66	13.66	0.00	0.00	0.00	0.00	0.00
boiler 1BLR	2.70	2.70	0.25	2.29	34.95	41.61	0.00
boiler 2BLR	2.70	2.70	0.21	1.96	29.90	35.59	0.00
boiler 3BLR	0.65	2.59	0.20	1.88	28.66	17.06	0.00
Paint booth	0.41	0.41	0.00	0.86	0.00	0.00	0.349
Total Emissions	230.548	165.362	3.012	10.2	142.8	152.9	1.745

County Attainment Status

The source is located in Howard County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Boilers 1BLR and 2BLR are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because they were constructed in 1964, which is prior to applicability date of this rule.
- (b) Boiler 3BLR is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because it was constructed in 1999 and has a capacity greater than ten million British thermal units per hour. This boiler only has the capability of combusting natural gas, therefore, the only requirement pursuant to this rule is that records shall be kept of the fuel usage each day of operation.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Parts 61 or 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is a major source because it has the potential to emit greater than 250 tons per year of all criteria pollutants and it is not one of the 28 listed source categories. This source is not a secondary metal production facility because it does not melt any scrap metal from outside the facility.

The following tables show modifications made to this source, by year. The tables show the PTE as limited by 326 IAC 6-1 for each facility subject to this rule. Then the tables show which facilities require more stringent emission limits to render the requirements of 326 IAC 2-2 (PSD) not applicable. There is a separate table for each modification. Following each table is a list of conditions necessary to render the requirements of 326 IAC 2-2 (PSD) not applicable.

1978 Modification

Facility	PTE pursuant to 326 IAC 6-1	Limits necessary to render PSD not applicable
	PM	PM
	(tons/yr)	(tons/yr)
Furnace 5RF	92.5	24.999
Total	92.5	24.999

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from furnace 5RF shall not exceed 0.457 pounds per ton of metal melted.
- (b) The amount of metal melted shall not exceed 109,482 tons per 12 consecutive month period. For the first twelve month after issuance of this permit, the limit shall be 9,123.5 tons per month.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1983 Modification

Facility	PTE pursuant to 326 IAC 6-1	Limits necessary to render PSD not applicable
	PM	PM
	(tons/yr)	(tons/yr)
Furnace 6RF	36.2	24.999
Total	36.2	24.999

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from furnace 6RF shall not exceed 0.457 pounds per ton of metal melted.
- (b) The amount of metal melted shall not exceed 109,482 tons per 12 consecutive month period. For the first twelve month after issuance of this permit, the limit shall be 9,123.5 tons per month.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1984 Modification

Facility	PTE pursuant to 326 IAC 6-1	Limits necessary to render PSD not applicable
	PM	PM
	(tons/yr)	(tons/yr)
Furnace 2RF	92.5	24.999
Total	92.5	24.999

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from furnace 2RF shall not exceed 0.457 pounds per ton of metal melted.
- (b) The amount of metal melted shall not exceed 109,482 tons per 12 consecutive month period. For the first twelve month after issuance of this permit, the limit shall be 9,123.5 tons per month.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1988 Modification

Facility	PTE pursuant to 326 IAC 6-1	Limits necessary to render PSD not applicable
	PM	PM
	(tons/yr)	(tons/yr)
Furnace 1ARF and 1BRF	22.5 (each)	19.57 (combined)
paint booth	0.41	0.41
6 die cast machines	4.02	4.02
Total	49.43	24

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from furnaces 1ARF and 1BRF shall each not exceed 2.35 pounds per ton of remelt.
- (b) The amount of remelt to furnaces 1ARF and 1BRF shall not exceed 68,046 tons per 12 consecutive month period (combined limit for both furnaces). For the first 12 months after issuance of this permit, the limit shall be 5,670.5 tons per month (combined limit for both furnaces).

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1994 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
DC3 Rotoblast	6.76	6.76	19.639	9.639
eight die cast machines	5.36	5.36	5.36	5.36
Total	12.12	12.12	24.999	14.999

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from cartridge filter DC3A controlling the DC3 Rotoblast shall not exceed 4.48 pounds per hour.
- (b) The PM10 emissions from cartridge filter DC3A controlling the DC3 Rotoblast shall not exceed 2.20 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1995 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Furnaces 7RF and 8RF	8.7 (each)	8.7 (each)	20.309	10.309
seven die cast machines	4.69	4.69	4.69	4.69
Total	22.09	22.09	24.999	14.999

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM10 emissions from furnaces 7RF and 8RF shall each not exceed 1.336 pounds per ton of remelt.
- (b) The PM emissions from furnaces 7RF and 8RF shall each not exceed 2.632 pounds per ton of remelt.

- (c) The amount of remelt to furnaces 7RF and 8RF shall not exceed 15,431 tons per 12 consecutive month period (combined limit for both furnaces). For the first 12 months after issuance of this permit, the limit shall be 1,286 tons per month (combined limit for both furnaces).

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1997 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Furnaces 9RF and 10RF	8.7 (each)	8.7 (each)	19.31	9.31
Furnace 3RF	7.8	7.8	4.69	4.69
Total	25.1	25.1	24	14

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from furnaces 3RF, 9RF, and 10RF shall each not exceed 2.050 pounds per ton of remelt.
- (b) The PM10 emissions from furnaces 3RF, 9RF, and 10RF shall each not exceed 1.230 pounds per ton of remelt.
- (c) The amount of remelt to furnaces 3RF, 9RF, and 10RF shall not exceed 20,764 tons per 12 consecutive month period (combined limit for all three furnaces). For the first 12 months after issuance of this permit, the limit shall be 1,730.3 tons per month (combined limit for all three furnaces).

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1998 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
DC2 and DC6 mesh belt shotblast	13.52	13.52	2.00	2.00
Furnace 4RF	20.1	20.1	15.97	5.97
nine die cast machines	6.03	6.03	6.03	6.03
Total	39.65	39.65	24	14

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of PSD not applicable, the following conditions shall apply:

- (a) The PM emissions from cartridge filter DC2 controlling the DC2 and DC6 Mesh Belt shotblast machines shall not exceed 2.51 pounds per hour.
- (b) The PM10 emissions from cartridge filter DC2 controlling the DC2 and DC6 Mesh Belt shotblast machines shall not exceed 0.23 pounds per hour.
- (c) The PM emissions from furnace 4RF shall not exceed 0.720 pounds per ton of metal melted. This condition shall supersede the requirements of Condition D.9.1(b)(1) of Construction Permit CP067-10006-00065 issued December 7, 1998.
- (d) The PM10 emissions from furnace 4RF shall not exceed 0.720 pounds per ton of metal melted. This condition shall supersede the requirements of Condition D.9.1(b)(2) of Construction Permit CP067-10006-00065 issued December 7, 1998.
- (e) The amount of metal melted in furnace 4RF shall not exceed 22,149 tons per 12 consecutive month period.
- (f) Furnace 4RF shall melt only clean scrap generated on site.
- (g) The melt rate of furnace 4RF shall not exceed 6.5 tons per hour.
- (h) All of the furnaces shall combust only natural gas fuel.
- (i) The Permittee shall not melt any scrap from outside sources in any of their furnaces. Therefore, the source will not be classified as a secondary metal processing plant, one of the 28 listed source categories.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

1999 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
DC4 wire mesh shotblast	18.02	18.02	N/A	12.66
two die cast machines	1.34	1.34	N/A	1.34
Total	19.36	19.36	N/A ¹	14

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from baghouse DC4 controlling the DC4 wire mesh shotblast machine shall not exceed 5.40 pounds per hour.

¹

The limited emissions pursuant to 326 IAC 6-1-2 are sufficient to render PSD not applicable for PM.

- (b) The PM10 emissions from baghouse DC4 controlling the DC4 wire mesh shotblast machine shall not exceed 3.12 pounds per hour.

2000 Modification

Facility	PTE pursuant to 326 IAC 6-1		Limits necessary to render PSD not applicable	
	PM	PM10	PM	PM10
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Boiler 3BLR	0.65	2.59	N/A	2.59
DC5 Tumbleblast shotblast	6.76	6.76	N/A	7.39
six die cast machines	4.02	4.02	N/A	4.02
Total	11.43	13.37	N/A ²	14

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) The PM emissions from cartridge filter DC3B controlling the DC5 Tumbleblast shotblaster shall not exceed 4.64 pounds per hour.
- (b) The PM10 emissions from cartridge filter DC3B controlling the DC5 Tumbleblast shotblaster shall not exceed 2.36 pounds per hour.
- (c) Pursuant to 067-11163 issued September 30, 1999, the boiler shall combust only natural gas fuel.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of criteria pollutants. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

²

The limited emissions pursuant to 326 IAC 6-1-2 are sufficient to render PSD not applicable for PM. Since it is possible for PM10 emissions to exceed PM emissions, specific PM10 emission limits are still needed to render PSD not applicable.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Furnaces

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to this rule, the particulate matter (PM) emissions from each of the furnaces identified as 3RF, 4RF, 7RF, 8RF, 9RF, and 10RF shall not exceed 0.03 grains per dry standard cubic foot of exhaust air. The following table shows the equivalent limits in pounds per hour, and tons per year, assuming operation at maximum capacity for 8760 hours per year.

Furnace ID	Flow Rate (acfm)	Outlet Temperature (°F)	Limit (lbs/hr)	Limit (tons/yr)
3RF	8,787	216	1.77	7.8
4RF	17,879	120	4.60	20.1
7RF	12,500	400	1.98	8.7
8RF	12,500	400	1.98	8.7
9RF	12,500	400	1.98	8.7
10RF	12,500	400	1.98	8.7

326 IAC 6-1-15 (Nonattainment Area Particulate Limitations for Howard County)

Pursuant to this rule, the following conditions shall apply:

- (a) The particulate matter (PM) emissions from the furnace 1ARF shall not exceed 0.39 grains per dry standard cubic foot of exhaust air and 22.5 tons per year.
- (b) The particulate matter (PM) emissions from the furnace 1BRF shall not exceed 0.39 grains per dry standard cubic foot of exhaust air and 22.5 tons per year.
- (c) The particulate matter (PM) emissions from the furnace 2RF shall not exceed 0.85 grains per dry standard cubic foot of exhaust air and 92.5 tons per year.
- (d) The particulate matter (PM) emissions from the furnace 5RF shall not exceed 0.85 grains per dry standard cubic foot of exhaust air and 92.5 tons per year.
- (e) The particulate matter (PM) emissions from the furnace 6RF shall not exceed 0.63 grains per dry standard cubic foot of exhaust air and 36.2 tons per year.

The other furnaces listed in 326 IAC 6-1-15 have been replaced.

State Rule Applicability - Boilers

Permits 067-11163, issued September 30, 1999 and 067-11508, issued December 8, 1999 state that 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) applies to boiler BLR3. However, since this boiler is located at a source in Howard County and Howard County is a listed source in 326 IAC 6-1-7, the boiler is subject to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations). Boilers subject to 326 IAC 6-1-2 are not subject to 326 IAC 6-2-4.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

The particulate matter (PM) emissions from each of the boilers BLR1, BLR2, and BLR3 shall not exceed 0.01 grains per dry standard cubic foot of exhaust air.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

The potential to emit SO₂ from each boiler is less than 25 tons per year and 10 pounds per hour; therefore, the requirements of this rule do not apply to any of the boilers.

State Rule Applicability - Shotblast Machines

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to this rule, the following conditions shall apply:

- (a) The particulate matter (PM) emissions from the wet scrubber DC1 controlling the shotblast machine identified as the DC1 Pangborn shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (b) The particulate matter (PM) emissions from the cartridge filter DC2 controlling the shotblast machine identified as the DC2 Mesh belt shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (c) The particulate matter (PM) emissions from the cartridge filter DC6 controlling the shotblast machine identified as the DC6 Mesh belt shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (d) Pursuant to Significant Source Modification 067-10648, issued June 18, 1999, the particulate matter (PM) emissions from the baghouse DC3 controlling the shotblast machines identified as the DC3 Rotoblast and the DC5 Tumbleblast shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (e) Pursuant to Significant Source Modification 067-10648, issued June 18, 1999, the particulate matter (PM) emissions from the baghouse DC4 controlling the shotblast machine identified as the DC4 Wire mesh shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

The appropriate baghouse, cartridge filter, or wet scrubber shall be in operation at all times the shotblast machines are in operation, in order to comply with these limits. The following table shows the equivalent limits in pounds per hour and tons per year, assuming operation at maximum capacity for 8760 hours per year.

Facility ID	Flow Rate (acfm)	Outlet Temperature (°F)	Limit (lbs/hr)	Limit (tons/yr)
DC1 Pangborn controlled by wet scrubber DC1	8,787	216	1.77	7.8
DC2 and DC6 mesh belt shotblasters controlled by cartridge filter DC2	12,000	70	3.09	13.5
DC3 Rotoblast shotblaster controlled by a cartridge filter DC3A	6,000	70	1.54	6.8
DC5 Tumbleblast shotblaster controlled by cartridge filter DC3B	6,000	70	1.54	6.8
DC4 Wire mesh shotblaster controlled by baghouse DC4	16,000	70	4.11	18.0

State Rule Applicability - Painting

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The paint booth and the miscellaneous painting operations are not subject to the requirements of this rule because they were constructed before July 1, 1990 and the potential to emit VOC is less than 25 tons per year. No other 326 IAC 8 rules apply.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to this rule, the particulate matter (PM) emissions from the paint booth shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

State Rule Applicability -

Insignificant Activities as follows:

- (a) one hundred twenty nine (129) die casting machines, identified as DCAST1;
- (b) trim operations including seventy-three (73) trim machines;
- (c) tooling operations including twenty-two (22) dry grinding/sanding/cutting stations and nine (9) wet grinding stations;
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (f) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal;
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;

326 IAC 8-1-6 (Best Available Control Technology (BACT))

None of the insignificant VOC emitting facilities listed above are subject to the requirements of this rule because the potential to emit VOC is less than 25 tons per year. No other 326 IAC 8 rules apply.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to this rule, the particulate matter (PM) emissions from each of the insignificant activities listed above shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The facilities at the Kokomo Casting Plant have applicable compliance monitoring conditions as specified below:

- (a) Visible emissions notations of each of the furnace stack exhausts and each of the controlled stack exhausts shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) The Permittee shall record the total static pressure drop across the baghouses and cartridge filters controlling the shotblast machines, at least once per shift when the shotblast machines are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure

reading is outside of the above mentioned range for any one reading.

- (c) An inspection shall be performed each calendar quarter of all bags and cartridge filters controlling the significant processes. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed.
 - (I) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (II) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (e) The Permittee shall monitor and record the pressure drop and flow rate of the wet scrubber, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 0.5 to 2.5 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rate shall be maintained at a minimum of 400 gallons per minute or a minimum flow rate established during the latest stack test. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pressure drop or flow rate is outside of the normal range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (f) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (g) The gauge employed to take the pressure drops across the scrubbers or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (h) An inspection shall be performed each calendar quarter of all of the scrubbers. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (i) In the event that a scrubber's failure has been observed:
 - (I) The affected process will be shut down immediately until the failed unit has been replaced.

- (II) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (j) Records shall be kept of the amount of metal melted in each of the furnaces.
- (k) The Permittee shall perform emissions testing as specified in the table below utilizing methods as approved by the Commissioner. All tests shall be repeated at least once every 5 years from the date of the valid compliance demonstration. For all PM10 tests, PM10 includes filterable and condensible PM10.

Facilities to be tested	Pollutants for which to test	Testing Schedule
cartridge filter DC3A controlling the DC3 Rotoblast shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
cartridge filter DC3B controlling the DC5 Tumbleblast shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
baghouse DC4 controlling the wire mesh shotblast machine	PM and PM10	Within 24 months after permit issuance, then once every 5 years
wet scrubber DC1 controlling the DC1 Pangborn shotblast machine	PM	Within 24 months after permit issuance, then once every 5 years
cartridge filter DC2 controlling the 2 mesh belt shotblast machines DC2 and DC6	PM and PM10	Between October 2003 and March 2004, then once every 5 years
either furnace 7RF or 8RF	PM and PM10	Within 12 months after permit issuance, then once every 5 years
either furnace 9RF or 10RF	PM and PM10	Within 12 months after permit issuance, then once every 5 years
furnace 4RF	PM and PM10	Between May 2004 and November 2004, then once every 5 years
furnaces 5RF and 6RF	PM	Within 12 months after permit issuance, then once every 5 years
either furnace 1ARF or furnace 1BRF	PM	Within 12 months after permit issuance, then once every 5 years

These monitoring conditions are necessary because the baghouses, cartridge filters, and the scrubber must operate properly to ensure compliance with 326 IAC 6-1-2, 326 IAC 5-1, 326 IAC 2-2, and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this aluminum casting plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T067-5246-00065.

Appendix A

(calculations)

Daimler Chrysler Kokomo Castings Plant
1001 E. Boulevard, Kokomo, Indiana 46904
T 067-5246-00065
Permit Reviewer: Nisha Sizemore

Limits pursuant to 326 IAC 6-1-2

All of the following facilities have limits of 0.03 gr/dscf pursuant to 326 IAC 6-1-2.

Furnace 4RF					
0.03 gr/dscf x	17879 dscfm x	60 min/hr /	7000 gr/lb =	4.60 lbs/hr =	20.1 tons/yr
Furnace 3RF					
8787 acfm at	216 degrees F =	6886 dscfm			
0.03 gr/dscf x	6886 dscfm x	60 min/hr /	7000 gr/lb =	1.77 lbs/hr =	7.8 tons/yr
Furnace 7RF					
12500 acfm at	400 degrees F =	7698 dscfm			
0.03 gr/dscf x	7698 dscfm x	60 min/hr /	7000 gr/lb =	1.98 lbs/hr =	8.7 tons/yr
Furnace 8RF					
12500 acfm at	400 degrees F =	7698 dscfm			
0.03 gr/dscf x	7698 dscfm x	60 min/hr /	7000 gr/lb =	1.98 lbs/hr =	8.7 tons/yr
Furnace 9RF					
12500 acfm at	400 degrees F =	7698 dscfm			
0.03 gr/dscf x	7698 dscfm x	60 min/hr /	7000 gr/lb =	1.98 lbs/hr =	8.7 tons/yr
Furnace 10RF					
12500 acfm at	400 degrees F =	7698 dscfm			
0.03 gr/dscf x	7698 dscfm x	60 min/hr /	7000 gr/lb =	1.98 lbs/hr =	8.7 tons/yr
DC1 Pangborn shotblaster controlled by wet scrubber DC1					
8787 acfm at	216 degrees F =	6886.404 dscfm			
0.03 gr/dscf x	6886 dscfm x	60 min/hr /	7000 gr/lb =	1.77 lbs/hr =	7.8 tons/yr
DC2 and DC6 Mesh belt shotblasters controlled by cartridge filter DC2					
12000 acfm at	70 degrees F =	12000 dscfm			
0.03 gr/dscf x	12000 dscfm x	60 min/hr /	7000 gr/lb =	3.09 lbs/hr =	13.5 tons/yr
DC3 Rotoblast shotblaster controlled by cartridge filter DC3A					
6000 acfm at	70 degrees F =	6000 dscfm			
0.03 gr/dscf x	6000 dscfm x	60 min/hr /	7000 gr/lb =	1.54 lbs/hr =	6.8 tons/yr
DC5 Tumbleblast shotblaster controlled by cartridge filter DC3B					
6000 acfm at	70 degrees F =	6000 dscfm			
0.03 gr/dscf x	6000 dscfm x	60 min/hr /	7000 gr/lb =	1.54 lbs/hr =	6.8 tons/yr
DC4 Wire mesh shotblaster controlled by baghouse DC4					
16000 acfm at	70 degrees F =	16000 dscfm			
0.03 gr/dscf x	16000 dscfm x	60 min/hr /	7000 gr/lb =	4.11 lbs/hr =	18.0 tons/yr

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Analysis of PSD applicability

Date of Modification	Facilities Installed	Max Capacity (tons/hr)	Remelt PM/PM10 Emissions (lb/ton)	Fluxing PM/PM10 Emissions (tons/year)	PM/PM10 Emissions after controls (tons/yr)	Limits needed to avoid PSD applicability					
						PM (tons/yr)	PM10 (tons/yr)	Remelt Limit (tons/yr)	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	PM Emission Limit (lbs/ton)
1978	Furnace 5RF	20	0.39	3.65	10.4828	24.999	none	109482			0.457
1983	Furnace 6RF	30	0.39	3.65	39.5222	24.999	none	109482			0.457
1984	Furnace 2RF	30	0.39	3.65	39.5222	24.999	none	109482			0.457
1988	Furnace 1ARF	1	0.39	3.65	5.01656	10.285	none	34023			2.35
	Furnace 1BRF	1	0.39	3.65	5.01656	10.285		34023			2.35
	six die cast machines				4.02						
	paint booth				0.41						
Total for 1988					14.46312	24.999		68046			
1994	DC3 Rotoblast	3			6.76	19.639	9.639		4.48	2.20	
	eight die cast machines				5.36	5.36	5.36				
Total for 1994					12.1	24.999	14.999				
1995	Furnace 7RF	10	0.39	3.65	7.0664	10.155	5.155	7715			2.632
	Furnace 8RF	10	0.39	3.65	7.0664	10.155	5.155	7715			2.632
	seven die cast machines				4.69	4.69	4.69				
Total for 1995					18.8	24.999	14.999	15431			
1997	Furnace 9RF	10	0.39	3.65	7.0664	8.907	5.344	8688			2.050
	Furnace 10RF	10	0.39	3.65	7.0664	8.907	5.344	8688			2.050
	Furnace 3RF	1.5	0.39	3.65	5.69984	7.185	4.311	3388			
Total for 1997					19.8	24.999	14.999	20764			
1998	Furnace 4RF	6.5	0.39	3.65	11.42231	7.969	7.969	22149			0.720
	DC2 and DC6 mesh belt shotblasts	13.586			13.52	11.00	1.00		2.51	0.23	
	nine die cast machines				6.03	6.03	6.03				
Total for 1998					30.97	24.999	14.999				

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PM10 Emission Limit (lbs/ton)
1.336 1.336
1.230 1.230
0.720

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Date of Modification	Facilities Installed	Max Capacity (tons/hr)	Remelt PM/PM10 Emissions (lb/ton)	Fluxing PM/PM10 Emissions (tons/year)	PM/PM10 Emissions after controls (tons/yr)	Limits needed to avoid PSD applicability					PM Emission Limit (lbs/ton)
						PM (tons/yr)	PM10 (tons/yr)	Remelt Limit (tons/yr)	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	
1999	DC4 wire mesh shotblast two die cast machines	2			18.02	23.66	13.66		5.40	3.12	
Total for 1999					1.34	1.34	1.34				
					19.4	24.999	14.999				
2000	Boiler 3BLR six die cast machines DC5 Tumbleblast shotblast	2			0.65	0.65	0.65				
					4.02	4.02	4.02				
					6.76	20.329	10.329		4.64	2.36	
Total for 2000					11.43	24.999	14.999				

Note: Remelt cannot occur during fluxing. For furnaces 1A and 1B remelt occurs 80% of time.
For furnaces 2, 4, and 6, remelt occurs 70% of the time. For furnaces 5 and 7-10, remelt occurs 20% of the time.
Fluxing emissions for all furnaces were calculated by the source.
The source estimates fluxing emissions for each furnace are 3.65 tons of PM/PM10 per year.
This is based on a maximum of 15 lbs flux/event for 1460 hrs per year.
The source used a PM/PM10 emission factor of 5 lbs/hr which they state is from an old stack test.

Remelt emissions for furnaces 5RF, 6RF, 7RF, 8RF, 9RF, and 10RF were calculated by the source.
Source used a PM/PM10 emission factor of 0.391 lbs/ton remelt for these furnaces.
Source states this emission factor is based on a stack test conducted in November 1999.

For furnace 4RF the source estimates fluxing emissions to be a maximum of 1.419 tons PM/PM10 per year
based on an emission factor of 1.944 lbs/hr.
Remelt emissions from furnace 4RF are based on a emission factor of 0.51 lbs/ton, which is based on stack test
on this furnace.

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PM10 Emission Limit (lbs/ton)